Environmental, Safety, and Occupational Health Management System Manual





















lefense Energy Support Center 2005

Environmental, Safety, and Occupational Health Management System Manual



Defense Energy Support Center 2005



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History of Document Revisions

The environmental, safety, and occupational health management system (ES&OH MS) manual is a living document. It will be revised as the program evolves and continually improves. The manual is, therefore, subject to the document management procedures described in *Management Procedure (MP)-10 Document Control* (see Attachment D). All previous revisions are obsolete. Subsequent revisions of the manual will retain the following table, adding appropriate information.

The ES&OH MS manual is reviewed annually and revised to ensure its continuing adequacy in supporting DESC's ES&OH Policy.

Revision	Date	Comment or Summary of Major Changes	Reason for Changes
Revision 1.0			Draft, incorporating DESC-WE comments on text, EMPs and SOPs
Revision 1.1	March 2003		Draft, incorporating DESC-WE comments on text.
Revision 1.2	February 2005	Draft Final ES&OH MS Manual	Integration of Safety & Occupational Health into DESC's EMS.



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1.0 INTRODUCTION

1.1 Background

Executive Order (EO) 13148, Greening the Government through Leadership in Environmental Management, 21 April 2000, requires Federal agencies to implement environmental management systems (EMS) at appropriate facilities by 31 December 2005. Section 101 of the Executive Order requires that Federal agencies "integrate environmental accountability into agency day-to-day decision making and long-term planning processes, across all agency missions, activities and functions." Meeting this goal will require the understanding and participation of DESC Headquarters personnel and onsite staffs.

In response to the EO, the Department of Defense (DOD) and Defense Logistics Agency (DLA) issued EMS policy.

- DOD EMS Policy (5 April 2002) requires DOD facilities to implement an EMS that emphasizes DOD leadership; commits to compliance, pollution prevention (P2), and continuous improvement; promotes operational readiness and execution of military mission; and incorporates environmental accountability across the core business functions.
- DLA EMS Policy (15 June 2004) commits to environmental stewardship, risk and pollution reduction, and compliance with legal and other requirements, while emphasizing mission priorities. The policy requires DLA activities to meet the EO requirement by adopting the internationally recognized EMS standard ISO 14001.

In a policy letter dated 14 May 2004 (see Attachment B to this manual), DESC leadership has chosen to *integrate safety and occupational health management within its EMS*. The resulting Environmental, Safety, and Occupational Health Management System (hereinafter referred to as the ES&OH MS) is described in this manual. Implementation of the ES&OH MS will meet EO 13148 and DOD, DLA, and DESC policy requirements.

EO 13148 requires
Federal agencies to
implement EMS at
"appropriate facilities"
by 31 December 2005.
DESC Americas East
and West Regional
Offices and Defense
Fuel Support Points
(DFSPs) have been
designated as
"appropriate facilities."



Courtesy DESC

1.2 Standards

DESC's ES&OH MS is modeled after two internationally recognized standards:

- ISO 14001, Environmental management systems—Specification with guidance for use, published by the International Organization for Standardization (ISO) in 1996
- OHSAS 18001, Occupational health and safety management systems— Specification, published by the British Standards Institution (BSI) in 2002

DESC is currently not seeking third party certification to either of these standards.

1.3 Scope

EO 13148 EMS requirements apply to "appropriate facilities." DESC, in coordination with DLA, has determined that appropriate facilities include:

- DESC Americas West Regional Office
- DESC America East Regional Office
- Five Defense Fuels Support Points (DFSPs) in the continental United States

Additional DESC activities may be incorporated into the ES&OH MS as it evolves.

1.4 ES&OH MS manual

This manual describes the DESC ES&OH MS and its elements, and provides guidance to facilitate required documentation. The manual is intended for use by DESC personnel at all levels and in all functions to guide their commitment to ES&OH accountability in their daily work.

Table 1–1 describes the major sections and attachments of this EH&OH MS manual.



SECTION 1: INTRODUCTION

Table 1-1. ES&OH MS Manual Organization

Title	Description
Section 1 Introduction	Introduces DESC's ES&OH MS, international standards, and key terms. Describes the manual's organization.
Section 2 DESC Organization	Describes DESC and DESC-F missions and organizational structure.
Section 3 DESC ES&OH MS	Describes the ES&OH MS and fundamental concepts. Provides and establishes criteria and general roles and responsibilities.
Attachment A Glossary	Defines ES&OH MS-related terms and acronyms.
Attachment B DESC ES&OH Policy	Provides DESC's current ES&OH Policy.
Attachment C DESC-F ES&OH Objectives and Targets	Lists current DESC-F ES&OH objectives and targets.
Attachment D ES&OH MS Management Procedures	Provides management procedures to operate and maintain each element of the DESC ES&OH MS.
Attachment E ES&OH Training Plan	Inventories ES&OH training required for DESC employees.
Attachment F References	Identifies other sources of information useful in ES&OH MS development, implementation, operation, and maintenance.

ISO 14001, **Environmental** management systems **Specification with** guidance for use, is the internationallyaccepted EMS standard used by corporate, municipal, and government organizations worldwide as their EMS framework.

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OHSAS 18001, **Occupational Health** and Safety **Management Systems Specification**, is not yet a formal international standard, but is the widely accepted framework for S&OH management systems.

DESC'S ES&OH MS framework combines elements of ISO 14001 and OHSAS 18001 and conforms with both.



GySgt. Keith A. Milks. USMC Website Photo Gallery

1.5 Key Terms and Definitions

The following terms are used with very specific meaning throughout this manual. Attachment A provides a more complete glossary of pertinent terms and acronyms.

ES&OH MS

That part of DESC's overall management system that includes organizational structure, planning activities, responsibilities, practices, procedures, processes, and resources for developing, implementing, achieving, reviewing, and maintaining the ES&OH Policy.

ES&OH MS Criteria

A set of detailed criteria clearly defining requirements for each of the seventeen ES&OH MS elements. The criteria support comprehensive planning and implementation and are auditable to support the periodic audits and management review.

Process

Unit operations supportive of the military mission that, due to some characteristic (aspect) they exhibit, can cause adverse impacts to the environment or personnel health and safety. Typical processes at DESC DFSPs include fuel storage; pipeline operation and maintenance (O&M); ship, barge, and tanker off-loading; railcar loading and off-loading; truck loading and off-loading; and laboratory analyses on fuel samples.



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Aspect

A characteristic of a process that can cause an environmental impact. Each process may have several aspects. Standard environmental aspects identified for DESC processes include:

- Air emissions
- Energy consumption
- Excavation near utilities
- HM use
- HW generation
- Natural resource consumption
- Noise generation
- Potable water: backflow/cross connection
- Soil erosion/disturbance
- SW generation: recyclable/nonrecyclable
- Spill: fuel or chemical
- Stormwater discharge: non-point source
- Stormwater discharge: point source
- Universal waste generation
- Wastewater discharge: industrial waste
- Wastewater discharge: sanitary waste
- Water consumption: potable/non-potable

Hazard

A characteristic of a process that can cause an impact to worker health and safety (such as illness, injury, or death), or damage to the work place environment or property. Standard hazards identified for DESC processes:

- Asbestos
- Biohazard
- Confined space/suffocation
- Crush
- Drowning
- Electrocution
- Explosion
- Fire
- Hazardous substance exposure: dermal contact
- Hazardous substance exposure: ingestion
- Hazardous substance exposure: inhalation
- Hazardous substance exposure: injection
- Lead paint exposure
- Lifting/ergonomic

The term "aspect" denotes a characteristic of a process that can cause an environmental impact. "Hazards" are characteristics that can cause a safety or occupational health impact.

Example:

Process

Truck loading rack

Aspects

Air emissions Hazardous material Spill

Hazards

Explosion

Fire

Hazardous substance exposure (dermal)

Hazardous substance exposure (inhalation)

Trip/fall/slip

Vehicle accident

- Noise
- Radon
- Trip/fall/slip
- Vehicle accident
- Weather

Impact

The effect of a process's environmental aspects or S&OH hazards on environmental or S&OH resources.

Risk to Mission

Adverse effects on mission readiness resulting from environmental or S&OH impacts. Possible risks to mission include regulatory scrutiny; fines, penalties, or incarceration; criminal and civil investigations; spill cleanup or other corrective action costs; adverse public perception; litigation and lawsuits; accidents, injuries, or illnesses; and decreased job performance.

Objective

A statement that defines an end-state supporting DESC's Environmental Policy Statement. Objectives must be achievable and should be measurable.

Target

A detailed performance requirement that sets a limit, usually a quantity and/or a time frame, for the achievement of an objective. An objective may have more than one target.



REVISION DATE: 2/01/2005

2.0 **DESC ORGANIZATION**

2.1 **DESC Overview and Structure**

DESC is headquartered at Fort Belvoir in Virginia, and provides central support to all facilities and DFSPs. DESC is one of five inventory control points in the Defense Logistics Agency (DLA). Figure 2.1 depicts DESC's regional structure.

The relationship of DESC to the Department of Defense (DOD) is as follows:

DOD Responsible for managing the United States military structure and ultimately responsible for the operation of DESC DFSPs and facilities.

DLA Responsible for administering all logistical operations for the DOD, including petroleum logistics support to authorized customers.

DESC Provides petroleum logistics support to DLA. With an annual budget of \$3.5 billion, DESC purchases nearly 110 million barrels of petroleum products each year and spends more than \$300 million annually to transport fuel to its worldwide customer base. DESC manages 250 national stock numbers for petroleum products, including jet fuels, aviation gasoline, heating oils, power generation, naval propulsion fuels, lubricants, natural gas, and coal.

DESC

Supports military service bulk petroleum requirements through **Americas** inventory and transportation management and quality assurance for bulk petroleum products. DESC Americas is headquartered at Ft. Belvoir, Virginia, with two subordinate regional offices:

- ♦ Americas East, Houston, TX
- ♦ Americas West, San Pedro, CA

DESC DFSPs

Bulk fuels terminals managed as government-owned contractoroperated (GOCO) facilities and subject to a variety of Federal, state, and local ES&OH requirements. On a daily basis, DESC and contract personnel manage fuel inventories, carry out quality surveillance programs, monitor quality control programs and procedures, and oversee existing or potential environmental compliance activities. DESC manages DFSPs in the following locations:

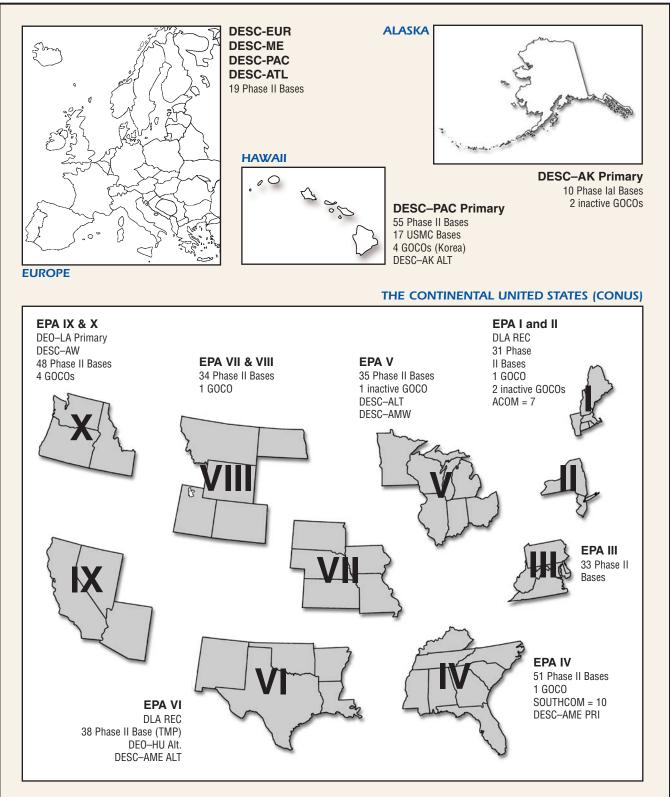
- ♦ DFSP Charleston, SC
- ♦ DFSP Verona, NY
- ♦ DFSP Grand Forks, ND
- ♦ DFSP San Pedro, CA
- ♦ DFSP Tampa, FL

DESC ES&OH MS MANUAL

Figure 2-1. DESC Regional Structure

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MAPS NOT TO SCALE



DESC's **mission** is to provide the DOD and other government agencies with comprehensive energy support in the most effective and economical manner possible. DESC's established **vision** is "to be recognized as the best and most effective energy support organization in the world."

DESC has identified ten **values** to guide daily activity and the vision for the future. These are incorporated into the ES&OH program as appropriate.

1. Customer satisfaction

We provide competent, reliable service involving employees and customers in the decision making process.

2. Responsible resource management

We make the most effective and efficient use of taxpayer dollars as stewards of the public trust.

3. Ethical conduct

We demonstrate integrity in all our dealings with industry, Federal agencies, fellow employees, and the communities in which we live.

4. Vision

We effectively guide our organization to industry leadership in an everchanging environment.

5. Success through teamwork

We promote achievement in a work environment that encourages creative ideas, listening, and respect for people.

6. Leadership

We demonstrate excellent, thorough, and innovative programs and policies.

7. Continuous improvement

We always strive to make process improvements to do business smarter and better.

8. Pride of workmanship

We produce quality work that enhances the organization's performance and provides team and personal satisfaction.

9. Environmental sensitivity

We establish policies and conduct operations with a strong sense of environmental awareness.

10. Responsible citizenship

We are actively involved in our communities.



DLA's Defense Energy Support Center has provided more than 1.9 billion gallons of fuel in support of **Operation Enduring** Freedom and more than 1.1 billion gallons of fuel in support of Operation Iraqi Freedom. That's enough to support the United States' daily fuel consumption for more than five days!

2.2 DESC-F Unit Overview and Structure

The Facilities and Distribution Management unit (DESC-F) advises on matters concerning worldwide DFSP operations, and storage and acquisition programs. The unit directs plans and programs for the operation and maintenance (O&M) of GOCO and contractor-owned, contractor operated (COCO) facilities. DESC-F is responsible for administering bulk fuels; maintenance and repair for DFSP operations; and environmental and safety programs for these facilities. DESC-F also provides environmental support to DOD bulk petroleum facilities, negotiates with foreign governments for large fuel purchases; and plans and administers large purchase base contracts and fueling and laboratory testing. The DESC-F Commodity Business Unit includes the following divisions:

• DESC-FP, Procurement Division

Provides contract support for operation of government owned DFSPs, commercial petroleum storage, aircraft refueling and de-fueling at Naval Air Stations, automated fuel dispensing facilities at Army bases, laboratory sampling and testing of government owned products, and environmental assessment and remediation at government owned DFSPs. DESC-FP also has acquisition responsibilities in support of Financial Management System (FMS) programs and international agreements, and performs acquisition responsibilities relevant to the sale of government-owned fuel.



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DESC-FI, Inventory Division

Responsible for bulk and Post Camps and Stations fuel accounting, including Phase IIB capitalization of ground products, and implementation of end-use billing within the Defense Fuels Automated Management System. DESC-FI compiles and publishes the periodic "Worldwide Inventory and Storage Plan" and the "Inventory Management Plan."

DESC-FL, Optimization Division

Responsible for the development and maintenance of efficient and effective systems of storage and distribution facilities.

• DESC-FG, Global Support Division

Responsible for the facilities management of GOCO and COCO facilities, and preparing and negotiating international agreements for fuel support to U.S. military forces worldwide.

The following divisions of the DLA Enterprise Support (DES) office, provide direct support to DESC:

DESC-WE, Environmental and Safety Management Division

This division is responsible for management and oversight of environmental compliance, remediation projects and S&OH programs at DESC's DFSPs, and provides environmental compliance and cleanup support to hundreds of military fuel facilities worldwide.

DESC-WI, Engineering Plans and Services Division

Responsible for the Maintenance and Repair Program, and Military Construction (MILCON) Program for DOD fuel facilities worldwide.



2.3 **DESC-WE Division Overview and Structure**

DESC-WE is headquartered at Fort Belvoir in Virginia and is led by the Chief, Environmental and Safety Management Division, who is supported by a team of environmental protection and S&OH specialists (program managers). The program managers are responsible for ES&OH compliance at the DFSPs. They also support the Chief with ES&OH projects including training, report consolidation, implementation of P2 solutions, database management, MILCON prioritization, fuel spill prevention and response, implementation of soil and groundwater cleanup projects, natural and cultural resources management, pipeline leak detection projects, and S&OH issues.

Table 2-1 presents program management responsibilities of all DESC-WE personnel. Section 3.5 of this manual discusses general ES&OH MS roles and responsibilities. Specific responsibilities are established in the management procedures in Attachment D and in the DFSP-specific O&M Manuals.



Table 2-1. DESC-WE Positions and Responsibilities

Position	Responsibilities
Chief	 Plan and manage DESC ES&OH programs and ensure compliance for regional facilities. Specifically: Provide ES&OH MS support to DESC facilities, tenants, and contractors to ensure compliance with all applicable Federal, state and local ES&OH regulations. Review ES&OH documentation prepared by program managers and manage highly visible and politically sensitive programs. Formulate guidelines relating to the ES&OH Audit Program and coordinate reviews. Develop and manage the ES&OH budget and funding requirements for ES&OH projects at facilities. Provide technical support to DESC-R, Budget Division, in addressing budget shortfalls or accounting for expenditures. Manage DESC-WE personnel. Provide technical and policy guidance. Serve as a key environmental and safety advisor to the DESC Director and regional commanders within the DESC organization. Represent DESC-F at meetings, seminars and conferences sponsored by DOD, other Federal agencies, or industry, and present DESC-F positions on ES&OH matters. Prepare speeches, official letters, memoranda, messages, point papers, and briefings for key service officials. Respond to environmental quality policy inquiries from congressional offices, DOD, local-
Environmental protection program managers	 Respond to environmental quality policy inquiries from congressional offices, DOD, local-national offices of environmental groups, and other influential organizations and interested groups. Provide ES&OH MS and environmental program support to DESC facilities/DFSPs and contractors, to ensure compliance with all applicable Federal, state and local environmental regulations. Specifically: Coordinate DFSP environmental compliance inspections and perform oversight evaluations under the ES&OH audit program.
	 Support the development and implementation of corrective actions. Coordinate and review environmental compliance and restoration projects. Review maintenance, repair, and environmental projects, providing comments necessary to ensure compliance. Coordinate Federal, state, and local inspections at the facilities, and resolve issues relating to compliance or differences in regulatory interpretations. Manage facility/DFSP environmental programs, specifically:
	 Provide technical input on environmental issues and consult on matters concerning environmental compliance; protection of natural, cultural, historic, and archaeological resources; as well as community relations and compliance with the National Environmental Policy Act. Remain knowledgeable on compliance status for the region. Research and respond to requests for information, internally or externally. Stay abreast of latest developments and publications in the environmental compliance field, including emerging requirements.

Position	Responsibilities
protection program managers (continued)	 Provide formal and informal training to DESC-F and facility personnel for ES&OH MS compliance and emergency response (spills, leak detection), corrective action, and roles and responsibilities. Review proposed and final environmental laws or regulations to determine impact on facilities/operations. Develop technical documentation for projects and recurring operational expenses.
manager	 Plan, develop, administer, and customize programs to provide and ensure S&OH compliance. Specifically: Administer and manage a comprehensive S&OH program for DESC personnel and activities worldwide. Prepare instructions and directives, formulate policy for effective program management, and establish goals and provide procedural guidance for successful implementation of program objectives. Provide S&OH and fire protection technical consultation to the Commander, staff, and field activities of DESC. Specifically: Provide technical expertise and assistance to DLA headquarters, military services, DOD contractors, and other DOD and federal agencies on petroleum safety and hazardous material handling and storage issues. Provide S&OH, fire protection, and hazardous material storage and transportation technical expertise in developing specifications and statements of work for procedures and minor work projects at DFSPs and in reviewing DESC facility standards, maintenance activity project designs, and minor construction and MILCON project specifications and designs. Manage DESC fire prevention and protection programs for the DESC headquarters complex and the DFSPs. Specifically: Serve as the primary fire coordinator at DESCs headquarters complex. Review fire prevention and protection plans, programs, system designs; field implementation procedures; and ensure that plans and specifications for new facilities construction or modification include appropriate fire protection criteria. Perform physical inspections and administrative audits to evaluate DFSP compliance with applicable fire protection standards. Plan, schedule, and perform annual S&OH and fire prevention inspections of GOCO facilities. Specifically: Determine compliance status with applicable S&OH, transportation, hazardous materials, and fire protection laws and regulations. Identify and analy

Position	Responsibilities
S&OH program manager (continued)	 Manage the DESC Safety and Health Information Reporting System (SHIRS) database, including:
	Investigate and analyze causes and circumstances surrounding mishaps or major incidents causing environmental and S&OH impacts to determine the origin, causes, and contributing factors, including contributory acts or negligence.
	 Prepare comprehensive investigative reports describing findings, including recommendations for corrective actions to prevent recurrence.
	 Obtain and preserve all available evidence for use in possible further litigation or administrative action.
	 Analyze mishap data to identify trends and causal factors, and to provide recommendations for the elimination and control of a wide range of complex industrial S&OH, hazardous material, and fire hazards.
	 Implement and administer major safety program elements, including hazard communication, benzene, hazardous waste operations, emergency response standards, confined space/cargo tank entry, respiratory protection, and employee medical surveillance programs.
	 Develop and implement S&OH, fire protection, and safety training provisions and requirements for ISAs, MOUs, solicitations, and contracts for DESC facilities and operations worldwide, including the procurement, storage, handling and transportation of bulk petroleum products. Specifically:
	Review and coordinate solicitations and contracts for ES&OH training; recommend appropriate training methods and practices to improve operation and maintenance of the DFSPs.
	 Conduct reviews and recommend revisions to training program and course materials on oil spill prevention and control at DFSPs.
	 Keep abreast of the latest developments in the environmental field by reviewing technical publications, attending conferences and professional training seminars, and discussions with other government and industry representatives.
	 Prepare speeches, official letters, memoranda, messages, and briefings for key service officials.



CETO VACATION

2.4 DESC ES&OH MS Team

DESC has assembled an ES&OH MS team to facilitate the development, implementation, operation, and ongoing improvement of the ES&OH MS. The team is organized into two functional levels: the ES&OH MS implementation team comprised of superintendents from the five DFSPs, and the ES&OH MS management team comprised of DESC-WE Chief, environmental protection and safety specialists, and the Commanders of DESC Americas East and DESC Americas West.

General responsibilities of the team include:

- Assessing ES&OH aspects, hazards, and impacts at DESC energy support operations;
- Defining achievable ES&OH targets and objectives;
- Coordinating ES&OH training and related activities; and
- Conducting periodic management reviews of the management system and implementing corrective/preventive actions.

The team provides a central hub for communication and coordination of ES&OH MS initiatives across DESC operations at all levels and functions.



REVISION DATE: 2/01/2005

SECTION 3.0 DESC ES&OH MS

3.1 Purpose of the ES&OH MS

The purpose of the ES&OH MS is to enhance DESC's military mission through a proactive approach to preventing or minimizing environmental and safety risks. The management system applies a cyclic approach to:

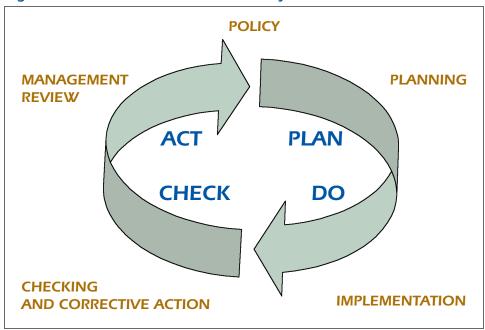
- Promote efficiency though effective planning, implementation, and continual review and improvement of ES&OH programs;
- Integrate ES&OH considerations into DESC's day-to-day operations;
 and
- Enhance performance throughout the facilities and divisions by enabling decision-makers to identify, prioritize, and mitigate ES&OH and mission risks.

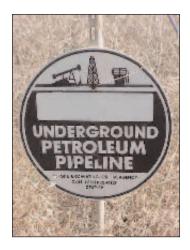
3.2 ES&OH MS Model

DESC's ES&OH MS is modeled on the cyclic "Plan-Do-Check-Act" approach found in ISO 14001 and OHSAS 18001. The Plan-Do-Check-Act cycle, mirrored in the ES&OH MS components—Policy, Planning, Implementation, Checking and Corrective Action, and Management Review—promotes continual improvement in ES&OH performance. Figure 3-1 illustrates the continual improvement cycle and relationships to management system components.

EO13148 Section 101 provides a basic vision for DESC's ES&OH MS, requiring Federal agencies to "integrate environmental accountability into agency day-to-day decisionmaking and long-term planning processes, across all agency missions, activities, and functions ...environmental management considerations must be a fundamental... component [of] policies, operations, planning, and management."

Figure 3-1. The Plan – Do – Check – Act Cycle





The five ES&OH MS components are briefly described as follows:

Policy

Senior leaders commit to managing DESC's ES&OH affairs, including compliance, P2, and continual performance improvement.

Planning

DESC identifies pertinent requirements, processes and their potential to affect the human and natural environments, and inherent risks to mission and priorities; establishes performance objectives to reduce priority risks; and develops plans to achieve objectives.

Implementation

DESC defines, documents, and implements procedures to sustain the ES&OH MS, manage ES&OH programs, and operate processes in a safe and environmentally sound manner.

Checking and Corrective/Preventive Action

DESC periodically evaluates the ES&OH MS, ES&OH programs, and compliance status and implements corrective/preventive actions to improve performance.

• Management Review

Senior leaders periodically review the ES&OH MS and take action to improve it.

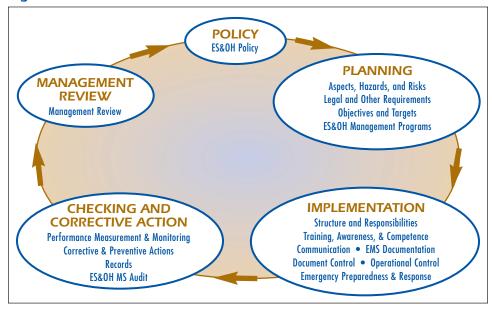


Figure 3-2. The DESC ES&OH MS Framework

REVISION 1.2

REVISION DATE: 2/01/2005

The five components of DESC's ES&OH MS include a total of 17 elements. Figure 3-2 illustrates the basic relationship between the components and elements.

Each element is defined by criteria presented in Section 3-4, below. The management procedures provided in Attachment D to this manual describe each element in detail, define roles and responsibilities to operate and maintain the element, describe relationships between the elements, and reference other key documents.

3.3 Fundamental ES&OH MS Concepts

The ES&OH MS is founded on four key concepts:

- Mitigating risks to mission resulting from environmental or health and safety considerations,
- Focusing management attention on processes,
- Ensuring ES&OH considerations are a part of all DESC employees' jobs, and
- Ensuring ready access to ES&OH information.

Mitigating Mission Risk

The DESC ES&OH MS supports mission readiness. Military operations, by their nature, involve acceptance of some level of risk. Balancing potential risks and benefits is an essential part of operational planning. Mission-supporting processes operated on DESC DFSPs can impact personnel health and safety and environmental resources, and these impacts can adversely affect mission readiness.



ES&OH accountability is a part of every employee's job.

DESC's ES&OH MS integrates ES&OH considerations into day-to-day activities at many levels and functions across the organization by:

- Providing DFSP personnel with the ES&OH information and training they need to operate in a safe and environmentally sound manner.
- Encouraging planners and decision-makers to consider ES&OH in cost, quality, and service decisions.

An effective ES&OH MS reduces surprises and the likelihood of having to face that next ES&OH crisis which could impact mission.

Mission impacts resulting from environmental problems can include regulatory scrutiny, fines or penalties, incarceration of key personnel, cleanup or other corrective action costs, adverse public perception, and/or lawsuits. Mission impacts from S&OH problems can include interruption of operations and distractions from work, decreased job performance, investigations, fines and penalties, incarceration of key personnel, and/or the cost of corrective action.

DESC's commitment to readiness implies a commitment to identifying and controlling potential risks to readiness. The management system is designed as a systematic approach to identify, prioritize, and control aspects and hazards that can affect DESC's mission capability.

Process Focus

DESC's EMS uses the concept of "process" to break down mission supporting activities into manageable unit operations. Processes, due to some characteristic (aspect) they exhibit, can cause adverse impacts to the environment or personnel health and safety. Typical processes at DFSPs include fuel storage; pipeline operation and maintenance; ship, barge, and tanker off-loading; railcar and truck loading and off-loading; and laboratory analyses of fuel samples.

Processes are identified as a basis for defining procedures and delegating responsibilities for controlling their aspects and hazards. The management system highlights the fact that the authority and principal responsibility for control of processes belong to the process operators. It is at the process level where operators' mission responsibilities intersect with DESC-WE's ES&OH concerns.

Operators need to understand potential ES&OH impacts of their jobs and the potential consequences on readiness of failing to follow procedures. Operators' responsibility for the safe and environmentally sound operations of their practices is a key feature of the ES&OH MS.

Control of processes is improved through MS assigning responsibilities, training, communicating, and disseminating written procedures. Inspections and audits in the checking and corrective/preventive action component are designed to assess and improve the control of process.

ES&OH Accountability

Section 101 of EO 13148 requires that the EMS "integrate environmental accountability into agency day-to-day decision-making and long-term planning processes, across all agency missions, activities, and functions". DOD EMS Policy encourages DOD components to adopt an EMS and "integrate it in all core business areas".

DESC's management system integrates ES&OH considerations into day-to-day activities and long-term decision-making:

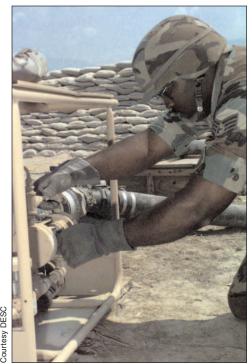
- DFSP-level personnel are provided information and training they need to operate in a safe and environmentally sound manner. Over time, ES&OH responsibilities become "a part of the job."
- Mission-level planners and decision-makers weigh ES&OH factors with considerations of cost, quality, and continuation of service.

The management system methodically reviews and improves operations. It promotes better business by reducing surprises and the costs of correcting ES&OH problems and related mission impacts. All DESC personnel have a role to play in the ES&OH MS. Section 3.5 of this manual outlines general responsibilities across DESC levels and functions. Detailed responsibilities are defined in Attachment D.

Access to Information

In an organization where all personnel have a role to play in ES&OH performance, individuals at all levels and functions need access to information facilitating safe and environmentally sound performance of their jobs:

- DFSP process operators need information supporting safe and environmentally sound process operation. The DFSP O&M manuals detail procedures and responsibilities for controlling aspects and hazards through operational control, training, communication, documentation, recordkeeping, inspection, and emergency response.
- Environmental and safety personnel need information to respond to regulatory requirements, to provide technical support to the DFSPs, and to fulfill responsibilities they have been assigned for maintaining the management system.
- Senior managers and decision makers need information that supports planning and decision making for missionsupporting operations and activities.



3.4 DESC ES&OH MS Criteria

The DESC ES&OH MS is defined by the criteria in Table 3-1. The criteria, modeled from ISO 14001 and OHSAS 18001, can be audited and used as performance measures for reviewing the management system. Many elements are already in place, and DESC will build on current programs rather than "reinventing the wheel." Attachment D's management procedures guide operation and maintenance of each management system element in accordance with these criteria.



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Table 3-1. DESC ES&OH MS Criteria

Component and Element	DESC ES&OH MS Criteria		
	POLICY COMPONENT		
ES&OH Policy	Top management authorizes an ES&OH policy that clearly states overall ES&OH goals, that:		
	 Commits continually improving ES&OH performance; 		
	 Commits to complying with ES&OH requirements; 		
	Commits to the prevention of pollution;		
	Supports mission enhancement;		
	 Becomes the framework for setting and reviewing objectives and targets; 		
	Is appropriate to the nature and scale of the organization's ES&OH risks;		
	 Is signed, documented, implemented, maintained and communicated to all employees; 		
	 Is available to interested parties; 		
	 Is reviewed periodically to ensure it remains relevant and appropriate to the organization. 		
	PLANNING COMPONENT		
Aspects, Hazards, and Risk	Establish and maintain procedures to identify environmental aspects and S&OH hazards associated with the organization's activities, products, or services. The procedures should include identifying significant aspects and hazards through an assessment of risks, and implementation of necessary control measures. The procedures should address:		
	 Routine and non-routine activities; 		
	 Activities of all personnel having access to the workplace (including visitors and subcontractors); 		
	 Facilities at the workplace, whether provided by the organization or others. 		
	2. Document and keep this information up to date.		
	3. Ensure significant aspects, S&OH hazards, the results of risk assessment, and effects of identified controls are considered in setting ES&OH objective and targets.		
	4. The methodology for aspects and hazard identification and risk assessment should:		
	 Be defined with respect to its scope, nature, and timing to ensure it is proactive rather than reactive; 		
	 Provide for the classification of risks and identification of those that are to be eliminated or controlled; 		
	 Be consistent with operating experience and the capabilities of risk control measures employed; 		
	 Provide input to the determination of facility requirements, identification of training needs, and/or development of operational controls; 		
	 Provide for the monitoring of required actions to ensure both the effectiveness and timeliness of implementation. 		

Component and Element	DESC ES&OH MS Criteria
	PLANNING COMPONENT (cont'd)
Legal and Other Requirements	 Establish and maintain a procedure to identify and access legal and other applicable ES&OH requirements. Keep this information up to date. Communicate relevant information on requirements to employees and other interested parties.
Objectives and Targets	 1. Establish and maintain documented ES&OH objectives and targets: At each relevant level and function within the organization; Consistent with the ES&OH Policy; Considering: legal and other requirements, significant environmental aspects and S&OH hazards and risks, technological, financial, operational, and business requirements, the views of interested parties.
ES&OH Management Programs	 Establish and maintain (a) program(s) for achieving objectives and targets that designate: Responsibility and authority for achieving objectives at each relevant function and level of the organization. The means and time scale by which objectives are to be achieved. Review programs at regular and planned intervals and amend them to address changes to activities, products, services, and operating conditions.
	IMPLEMENTATION COMPONENT
Structure and Responsibility	 Define, document, and communicate roles, responsibilities, and authorities of personnel who manage, perform, and verify activities with ES&OH risks, to facilitate ES&OH management. Management provides resources essential to implementing, controlling and improving the ES&OH MS. Management appoints a management representative with defined roles, responsibilities, and authority for ensuring that: ES&OH MS requirements are planned, implemented, and maintained; The ES&OH MS is performing to requirements throughout the organization; Reports on ES&OH MS performance are presented for top management review as a basis for improvement. All those with management responsibility demonstrate commitment to continual improvement of ES&OH MS performance.

Component and Element	DESC ES&OH MS Criteria
	IMPLEMENTATION COMPONENT (cont'd)
Training, Awareness,	Personnel shall be competent (i.e., shall have appropriate education, training, experience) to perform tasks that may impact ES&OH.
and Competence	Identify training needs and require all personnel whose work may have a significant environmental or S&OH impact to receive appropriate training.
	3. Establish and maintain procedures to make employees at each relevant function and level aware of:
	 Significant environmental aspects and impacts and S&OH consequences of their work activities and the benefits of improved personal performance;
	 The importance of conformance with ES&OH Policy and procedures and the requirements of the ES&OH MS, as well as potential consequences of departure from specified operating procedures;
	 Their roles and responsibilities in achieving conformance to ES&OH Policy and procedures and to requirements of the ES&OH MS, including emergency preparedness and response.
	4. Training procedures shall account for differing levels of responsibility, ability, and literacy; and risk.
Communication	Establish and maintain procedures to ensure that pertinent ES&OH information is communicated to and from employees and other interested parties. Procedures should address:
	 Internal Communication: Communication of ES&OH MS information between various levels and functions of the organization,
	 External Communication: Receiving, documenting, and responding to ES&OH MS- related communications from external interested parties.
	Document employee involvement and consultation and inform interested parties. Employees shall be:
	 Involved in the development and review of policies and procedures to manage risks;
	Consulted regarding changes that affect workplace S&OH matters;
	 Informed as to who is their employee S&OH representative and specified management representative.
	Document consideration of procedures for external communication on significant environmental aspects or S&OH hazards
Documentation	1. Establish and maintain information, in paper or electronic form, to:
	 Describe the core elements of the ES&OH MS and their interaction,
	Provide direction to related documentation.

Component and Element	DESC ES&OH MS Criteria
	IMPLEMENTATION COMPONENT (cont'd)
Document Control	 Establish and maintain procedures for controlling all ES&OH MS documents to ensure that: They can be located; They are periodically reviewed, revised as necessary, and approved by authorized personnel; Current revisions are available at all locations where operations essential to the functioning of the ES&OH MS are performed; Obsolete documents and data are removed from the points of issue and use or otherwise assured against unintended use; Archival documents and data are suitably identified.
Operational Control	 Identify operations and activities associated with identified risks where control measure need to be applied. Plan O&M of these activities to ensure they are carried under specified conditions by: Establishing and maintaining documented procedures where their absence could lead to deviations from ES&OH Policy and objectives and targets. Procedures should: \$ Stipulate operating criteria, Provide for control of identified ES&OH risks of goods, equipment, and services purchased and/or used by the organization, \$ Be communicated, with other ES&OH MS requirements, to suppliers and contractors; Establishing and maintaining procedures for the design of workplace, process, installations, machinery, operating procedures, and work organization to eliminate or reduce ES&OH risks at their source.
Emergency Preparedness and Response	 Establish and maintain plans and procedures to: Identify potential for and respond to incidents and emergency situations Prevent and mitigate likely associated environmental impacts or illness and injury Review/revise emergency preparedness and response plans procedures after an incident, accident, or emergency situation. Periodically test procedures.

Component and Element	DESC ES&OH MS Criteria	
CHECKING AND CORRECTIVE / PROTECTIVE ACTION COMPONENT		
Performance Measurement and Monitoring	 Establish and maintain documented procedures to regularly monitor and measure ES&OH performance. Procedures should provide for: Establishing proactive performance measures, qualitative and/or quantitative as appropriate to the needs of the organization; Periodically evaluating the status of:	
Corrective and Preventive Action	 Establish and maintain documented procedures to define responsibility and authority for: Investigating environmental impacts, accidents, incidents, noncompliance, and nonconformance; Taking action to mitigate consequences of environmental impacts, accidents, incidents, noncompliance, and nonconformance; Executing corrective and preventive actions. Procedures shall require that all proposed corrective and preventive actions be reviewed through the risk assessment process prior to implementation. Ensure corrective and preventive actions taken to eliminate the causes of actual and potential nonconformances are appropriate to the problems and ES&OH risks. Ensure changes to procedures resulting from nonconformance are documented and implemented. 	
Records	 Establish and maintain documented procedures for identification, maintenance, and disposition of ES&OH records, including the results of audits and reviews. Records shall be: Legible, identifiable, and traceable to the originating activity; Stored and maintained to be retrievable and protected from loss or damage; Maintained to support demonstration of conformance to the ES&OH MS. Establish and document appropriate record retention times. 	

Component and Element	DESC ES&OH MS Criteria
CHECKING AND CORRECTIVE / PROTECTIVE ACTION COMPONENT (cont'd)	
ES&OH MS Audit	 Establish and maintain procedures for periodic ES&OH MS audits to: Determine if the ES&OH MS: Conforms to planned arrangements for ES&OH management, including the ISO 14001 and OHSAS 18001 specifications, Is effectively implemented and maintained, Is effective in meeting policy and objectives and targets; Review the results of previous audits; Provide results to management; Address audit scope, frequency, method, and responsibilities for auditing and reporting. The audit program and schedule shall be based on the results of risk assessment and previous audits. Where possible, audits shall be conducted by personnel independent of those having direct responsibility for the activity under consideration.
MANAGEMENT REVIEW COMPONENT	
Management Review	 Top Management shall periodically review the ES&OH MS to ensure continuing suitability, adequacy, and effectiveness. Address potential changes to policy, objectives and targets, or other ES&OH MS elements, considering audit results, changing circumstances, and the commitment to continual improvement. Ensure information necessary for the review is collected. Document the review.

3.5 ES&OH MS Roles and Responsibilities

Table 3-2 presents general ES&OH MS roles and responsibilities for DESC-F personnel and organizations. The management procedures in Attachment D of this manual and the DFSP-specific O&M Manuals prescribe specific roles and responsibilities to ensure effective operation and maintenance of the ES&OH MS and environmentally sound and safe operation of DESC-F processes.

Table 3-2. General ES&OH MS Responsibilities

ES&OH MS Responsibility	DESC ESGOH ME	DESC-WE	DESC ESGOH.	DESC ESCOL	Env. Protection	of specialists DFSP QAD.	DFSP Super:	DFSP Open	Subcontrace	Sign
Provide ES&OH MS Management Support	~	~	~				v			
Establish, maintain, and review ES&OH MS Policy	~	~	~			~	~			
Establish, maintain, and review ES&OH objectives and targets	~	~	~	~	~	~	~			
Track requirements					~					
Identify processes, aspects, hazards, and risks			~	~	~			~		
Provide ES&OH MS training and awareness			~		~					
Receive ES&OH MS training	~	~	~	~	~	~	~	~		
Receive specific ES&OH training		~	~		~	~	~	~		
Ensure coordination of ES&OH information	~	~	~	~	~	~	~	~	~	
Regulatory interface		~			~	~	~			
Public interface		~	~	~	~	~				
Conduct ES&OH compliance evaluations					~					
Conduct local ES&OH compliance inspections						~	~	~		
Develop/implement corrective/preventive actions			~	~	~	~	~	~	~	
Provide information and assistance to operators			~	~	~	~	~			
Monitor resources					~	~				
Maintain documents and records					~	~	~	~	~	
Undertake and participate in ES&OH MS audit and review	~	~	~	/	~	~	~			



esy DES

ATTACHMENT A

GLOSSARY OF ES&OH TERMS AND ACRONYMS

Aspect (Environmental Aspect)

A characteristic of a process that can cause an environmental impact. Each process may have several aspects. Possible environmental aspects identified for DESC processes include:

- Air emissions
- Energy consumption
- Excavation near utilities
- HM use
- HW generation
- Natural resource consumption
- Noise generation
- Potable water: backflow/cross connection
- Soil erosion/disturbance
- SW generation: recyclable/non-recyclable
- Spill: fuel or chemical
- Stormwater discharge: non-point source
- Stormwater discharge: point source
- Universal waste generation
- Wastewater discharge: industrial waste
- Wastewater discharge: sanitary waste
- Water consumption: potable/non-potable

AST Aboveground storage tank

BSI British Standards Institute, publisher of the OHSAS 18001 Standard

CFR Code of Federal regulations

COCO Contractor owned, contractor operated

Compliance Adherence to Federal, state, local, DOD, DLA, regional and other applicable legal, regulatory,

or policy requirements

Conformance Adherence to DESC ES&OH MS criteria, as documented in Table 3-1 of the ES&OH MS

manual

COR Contracting officer's representative

COTR Contracting officer's technical representative

DENIX Defense Environmental Network and Information Exchange

DES DLA Enterprise Support Office

DESC Defense Energy Support Center

DESC-F DESC's Facilities and Distribution Management Unit

DESC-FG DESC-F's Global Support Division

DESC-F's Inventory Division

DESC-FL DESC-F's Optimization Division

DESC-FP DESC-F's Procurement Division

DESC-WE DESC's Environmental and Safety Management Division

DESC-WI DESC's Engineering Division

DFSP Defense Fuel Support Point (DESC bulk fuel terminal)

DLA Defense Logistics Agency

DLAI Defense Logistics Agency Instruction

Document Control

All actions taken regarding documents from creation to final disposition, including creation,

retention, storage, revision, revision control, disposal, and permanent archiving

DOD Department of Defense

EAP Emergency Action Plan

Ems Environmental management system

Environmental Resource

Sensitive environmental receptors (e.g., air, water, natural resources, etc.) or cultural or historic assets on or around a DESC facility that can be impacted by DESC's operations

Environmental Safety and Occupational Health Management System That part of DESC's overall management system that includes organizational structure, planning activities, responsibilities, practices, procedures, processes, and resources for developing, implementing, achieving, reviewing, and maintaining the ES&OH Policy

(ES&OH MS) EO 13148

Executive Order 13148, Greening the Government through Leadership in Environmental Management, 21 April 2000. Among other requirements, EO 13148 stipulates that Federal

agencies implement an EMS at each appropriate facility by 31 December 2005.

EPCRA Emergency Planning and Community Right-to-Know Act

ES&OH Environmental, safety, and occupational health

ES&OH Documents ES&OH documents contain instructions or information regarding operation of the ES&OH MS, management of ES&OH programs, and control of processes. As the management system matures, information in ES&OH documents is subject to change. Examples of ES&OH documents include this ES&OH MS manual, DFSP O&M manuals,

ES&OH management plans, and most of the other references cited in these MPs.

ES&OH Management **Program**

A documented course of action, with defined plans, resources, responsibilities, and authorities, which, when implemented, moves the implementing organization towards a desired end state

ES&OH Records

ES&OH records furnish objective evidence of activities performed or results achieved. Records are statements of fact for a given point in time. They address historical activity and must be maintained for a specified or indefinite period of time; their contents are not subject to change. Examples of ES&OH records include training records; manifests or bills of lading; communication records; required reports; compliance inspection results; minutes of ES&OH MS team meetings; etc.

ES&OH MS Environmental, safety, and occupational health management system

ES&OH MS Audit An external, periodic review of the ES&OH MS, conducted by personnel independent of DESC's organization, to determine conformance with ES&OH MS criteria, effectiveness of implementation and maintenance the ES&OH MS elements, and status in meeting ES&OH objectives and targets

ES&OH MS Criteria

A set of detailed criteria clearly defining requirements for each of the 17 ES&OH MS elements. The criteria support comprehensive planning and implementation and are auditable to support the periodic audit and management review. Table 3-1 of the ES&OH MS manual presents the ES&OH MS criteria. The DESC ES&OH MS criteria are derived from requirements prescribed in ISO 14001 and OHSAS 18001.

ES&OH MS Review

An internal, periodic review of the ES&OH MS, conducted by DESC-WE personnel, to determine conformance with ES&OH MS criteria, effectiveness of implementation and maintenance the ES&OH MS elements, and status in meeting ES&OH objectives and targets

External Communication Communication of ES&OH information with external parties, such as the public, interest groups, and regulators, including receiving, documenting, and responding to inquiries from external parties

Form 1391

Documents the scope and anticipated costs of the project, in addition to supporting documentation. This form is submitted to DESC-WE when requesting funds for environmental related projects

FRP Facility Response Plan

GOCO Government owned, contractor operated

Hazard

A characteristic of a process that can cause an impact to worker health and safety (such as illness, injury, or death), or damage to the work place environment or property. Possible hazards identified for DESC processes include:

- Asbestos
- Biohazard
- Confined space/suffocation
- Crush
- Drowning
- Electrocution
- Explosion
- Fire
- Hazardous substance exposure: dermal contact
- Hazardous substance exposure: ingestion
- Hazardous substance exposure: inhalation
- Hazardous substance exposure: injection
- Lead paint exposure
- Lifting/ergonomic
- Noise
- Radon
- Trip/fall/slip
- Vehicle accident
- Weather

Hazardous Substance

Any substance that requires a material safety data sheet (MSDS) under the Occupational Safety and Health Act, or that otherwise exhibits any characteristics hazardous to human health or the environment. For the purposes of this manual, mixtures, wastes, or other byproducts of hazardous substances are defined as hazardous substances.

HAZWOPER

Hazardous Waste Operations and Emergency Response

НМ

Hazardous material

HTIS

Richmond Hazardous Technical Information Services

HW/

Hazardous waste

Impact

The effect of a process's environmental aspects or S&OH hazards on environmental or

S&OH resources

Internal Communication Communication of ES&OH information between personnel at various functions and levels

Communication of DESC's organization, including DLA

ISA Int

Interagency support agreement

ISO

International Organization for Standardization, publisher of the ISO standards

REVISION 1.2

REVISION DATE: 2/01/2005

ISO 14001 The internationally recognized EMS standard, Environmental management systems—

specifications with guidance for use, first published by the ISO in 1996

MILCON Military construction

MOU Memorandum of understanding

MP Management procedure

MRE Maintenance, Repair and Environment program, where mandated funds are available to

support the requests for funding of environmental and engineering projects as per Form 1391

NEPA National Environmental Policy Act

O&M Operation and maintenance

Objective A statement that defines an end-state supporting DESC's ES&OH Policy. Objectives must be

achievable and should be measurable.

ODS Ozone depleting substances

OHSAS 18001 Occupational Health Safety Assessment Series specification 18001, Occupational health and

safety management systems—Specification, first published by BSI in 1999

OPA-90 Oil Pollution Act

OSHA Occupational Safety and Health Act

P2 Pollution prevention

POA&M Plan of action and milestones detailing response to findings and issues identified during an

audit or inspection

Problem Generally, a deviation from expected results

Problem Solving Application of a structured approach to identify ES&OH problems and their root causes and

to develop and implement cost-effective, permanent solutions

Process Unit operations supportive of the military mission that, due to some characteristic (aspect)

they exhibit, can cause adverse impacts to the environment or personnel health and safety. Typical processes at DESC DFSPs include fuel storage; pipeline O&M; ship, barge, and tanker off-loading; railcar loading and off-loading; truck loading and off-loading; and laboratory

analyses on fuel samples.

Process Controls Procedures, with designated responsibilities and frequencies, implemented to control a

process's environmental aspects and S&OH hazards or to prevent or mitigate the impacts of

those aspects/hazards. Process control is achieved through effective:

- Training and awareness
- Internal communication
- Operational control (including replacing, changing, or eliminating the practice as well as following prescribed operation instructions)
- Emergency preparedness and response
- Compliance inspection and sampling and analysis
- Document and record control

Some process controls are required by regulation or policy. Many more are not "required," but are judged by DESC-WE to be necessary to achieve the above purposes or to otherwise minimize risks to mission.

Process Owner

The person, office, or department responsible for the day-to-day operation of a process

QAR DFSP quality assurance representative (also "QSR")

RAB Restoration Advisory Board

RCRA Resource Conservation and Recovery Act

Requirement (ES&OH Requirement)

Legislation, regulation, or policy issued by any executive, Federal, state, local, DOD, or DLA authority that addresses environmental or S&OH considerations and requires action by DESC-F

Risk to Mission

Adverse effects on mission readiness resulting from environmental or S&OH impacts. Possible risks to mission include regulatory scrutiny; fines, penalties, or incarceration; criminal and civil investigations; spill cleanup or other corrective action costs; adverse public perception; litigation and lawsuits; accidents, injuries, or illnesses; and decreased job performance

S&OH

Safety and occupational health

S&OH Resource

The health and safety or general well-being of DESC employees or others who may be impacted by DESC's operations, including environmental or workplace conditions that can contribute to personnel health and safety

SPCC

Spill Prevention Controls and Countermeasures

Target

A detailed performance requirement that sets a limit, usually a quantity and/or a time frame, for the achievement of an objective. An objective may have more than one target.

USACHPPM

United States Army Center for Health Promotion and Preventive Medicine

UST

Underground storage tank

ATTACHMENT B DESC-F ES&OH POLICY



DEFENSE LOGISTICS AGENCY

DEFENSE ENERGY SUPPORT CENTER 8725 JOHN J. KINGMAN ROAD, SUITE 4950 FORT BELVOIR, VIRGINIA 22060-6222

MAY 1 2 200#

MEMORANDUM FOR DISTRIBUTION

SUBJECT: Defense Energy Support Center (DESC) Environmental, Safety and Occupational Health (ES&OH) Management System Policy Statement

DESC's mission is to provide the Department of Defense (DoD) and other government agencies with wide-ranging fuel and energy products in the most effective and economical manner possible. The hazardous nature of the products we buy and sell necessitates sound management practices to protect human health and the environment. The ES&OH management system is an overall management process that includes organizational structure, planning activities, responsibilities, practices, and resources for developing, implementing, and achieving DESC's ES&OH policy. Our goal is to establish proactive management approaches that sustain compliance, avoid risk, prevent accidents, prevent pollution, reduce occupational illnesses and injuries, inform the public, and promote ES&OH principles throughout the work force consistent with international standards for ES&OH and the following agency objectives:

- a. Incorporating ES&OH management practices in all core business areas.
- Emphasizing strategic planning, including goals and targets for reducing environmental impacts, preventing occupational illnesses and injuries, and supporting mission priorities.
- c. Improving operations to ensure achievement of ES&OH goals and targets, and training to
 ensure employee proficiency and responsibility.
 - d. Implementing the best available technology where appropriate and economically feasible.
 - e. Fostering a spirit of openness and cooperation with federal and state regulators.
- f. Complying with all federal, state, local, and DoD ES&OH laws and regulations, verified by periodic internal and external audits.
- g. Reviewing the ES&OH management system periodically by senior leadership, with recommendations for improvement and corrective action.

DESC's ES&OH management system is a landmark approach to sustaining and improving our overall mission performance and protecting human health and the environment. The unique nature of our mission demands that ES&OH awareness and decision-making become an integral part of each and every employee's job. Your efforts in achieving the full potential of this initiative are essential.

RICHARD J. CONNELLY

Directo

deral Recycling Program Printed on Recycled Pa

DESC ES&OH MANAGEMENT SYSTEM POLICY STATEMENT

COMMANDERS AND SUPERINTENDENTS ENDORSEMENT PAGE

I pledge my support of DESC's Environmental, Safety, and Occupational Health Management System policy.

John Deininger
Terminal Superintendent
DFSP Tampa, FL

Don Mathews
Terminal Superintendent
DFSP Charleston, SC

Kenneth Peterson Terminal Superintendent DFSP Verona, NY

Dave Kovar Terminal Superintendent DFSP Grand Forks, ND

John Rifilato Terminal Superintendent DFSP San Pedro LTC Michael Baisden, USA Commander DESC Americas East

Lt. Col. Renita Alexander, USAF Commander DESC Americas West

ATTACHMENT C

DESC-F ES&OH OBJECTIVES AND TARGETS

Following are current Headquarters-level ES&OH objectives and targets:

OBJECTIVE 1

Increase utilization of automated leak detection systems for above ground storage tanks (ASTs), underground storage tanks (USTs), and pipelines storing DESC capitalized product.

Target: Equip 25 percent of ASTs, USTs and pipelines with automated leak detection systems by December 2006.

OBJECTIVE 2

Increase the percentage of DESC CD-ROM and/or Internet based oil-spill response plans, manuals and publications in relation to the hardcopy equivalents of these documents.

Target: Increase number of CD-ROM and/or Internet based environmental documents to 100 percent by December 2005.

OBJECTIVE 3

Update and revise the DESC Environmental Guide for Fuel Terminals, dated December 2002.

Target: Update and revise the DESC Environmental Guide for Fuel Terminals by December 2005.

OBJECTIVE 4

Reduce the environmental impact of reportable oil spills.

Target: Reduce reportable oil spill clean-up costs by 15 percent through a reduction in the size or quantity of reportable oil spills by December 2005.

OBJECTIVE 5

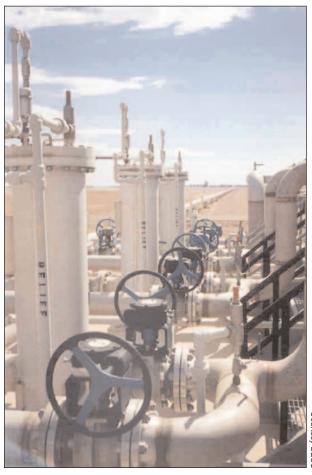
Update DESC-WE webpage to include more useful content and user interface. Consider posting the *Environmental Guide for Fuel Terminals* and other useful references to the webpage.

Target: Update DESC-WE webpage by December 2003.

OBJECTIVE 6

Meet the EMS goals of Executive Order 13148, Greening the Government through Leadership in Environmental Management.

Target: Implement the *EMS Manual* by December 2005.



ATTACHMENT D

ES&OH MANAGEMENT PROCEDURES

Attachment D provides ES&OH management procedures (MPs) for each of DESC's 17 management system elements. Each MP:

- Provides a statement of the element's purpose,
- Defines key terms,
- Describes the element and its operation and maintenance,
- Defines associated roles and responsibilities,
- References related elements and other key ES&OH MS documents, and
- Provides a review checklist.

Procedure Number	Procedure Title
MP-01	ES&OH Policy
MP-02	Aspects, Hazards, and Risk
MP-03	Legal and Other Requirements
MP-04	Objectives and Targets
MP-05	ES&OH Management Programs
MP-06	Structure and Responsibility
MP-07	Training, Awareness, and Competence
MP-08	Communication
MP-09	Documentation
MP-10	Document Control
MP-11	Operational Control
MP-12	Emergency Preparedness and Response
MP-13	Performance Measurement and Monitoring
MP-14	Corrective and Preventive Action
MP-15	Records
MP-16	E&SOH MS Audit
MP-17	Management Review

MANAGEMENT PROCEDURE 01 ES&OH POLICY

1.0 Purpose

This procedure guides DESC personnel in developing, communicating, and maintaining DESC's environmental, safety and occupational health (ES&OH) Policy. DESC's current ES&OH Policy statement is included as Attachment B to the ES&OH MS manual.

2.0 Definitions and Acronyms

Environmental,
Safety and
Occupational
Health
Management
System (ES&OH MS)

That part of DESC's overall management system that includes organizational structure, planning activities, responsibilities, practices, procedures, processes, and resources for developing, implementing, achieving, reviewing, and maintaining the ES&OH Policy.

3.0 Procedure

3.1 Discussion

DESC's ES&OH Policy documents ES&OH commitments and goals, is signed by the DESC director, and is communicated to all headquarters and DFSP personnel. The Policy commits to:

- Sustaining compliance,
- Avoiding risk,
- Preventing accidents,
- Preventing pollution,
- Reducing occupational illnesses and injuries,
- Informing the public, and
- Promoting ES&OH principles throughout the work force.

The Policy is posted on the DESC and DLA EMS websites to facilitate distribution within DESC and to the public. It is also posted on official bulletin boards at DESC Headquarters, regional offices, and DFSPs.

As a statement of DESC's fundamental goals regarding ES&OH performance, the Policy is a framework for setting performance objectives and targets and is subject to change over time with changes in DESC's mission and performance improvements. The Policy is reviewed and revised on an annual basis to ensure it describes DESC's current environmental goals. Results of the ES&OH MS Audit (see MP-16, ES&OH MS Audit) and ongoing environmental audits (see MP-13, Performance Measurement and Monitoring) may suggest that revisions to the Policy are needed. Additionally, headquarters or DFSP personnel may suggest revisions to the Chief, DESC-WE. Suggested revisions

are referred to the ES&OH MS team for approval. Revised policy statements are forwarded to the office of the DESC Director for signature.

3.2 Responsibilities

Person Responsible	Responsibility
Director, DESC	■ Endorse the DESC ES&OH Policy statement through signature and distribution.
ES&OH MS team	 Review and approve suggested ES&OH Policy revisions provided by the Chief, DESC-WE Forward suggested revisions to the DESC Director's office for approval and signature. Endorse revisions of the Policy.
Chief DESC-WE	 Maintain the DESC ES&OH Policy. Review and approve suggested ES&OH Policy revisions provided by the ES&OH program managers or other sources. Forward suggested revisions to the ES&OH MS team for review. Ensure the current ES&OH Policy is posted to DESC's website, and forward to DLA for posting on the DLA EMS website.
ES&OH program managers, DESC-WE	 Provide the Chief, DESC-WE with recommendations for ES&OH Policy revisions identified through the ES&OH audits program, ES&OH MS audits, or other sources. Support distribution of the ES&OH Policy through posting on headquarters and DFSP bulletin boards, verbal communication, and other means.
QARs, DESC-WE	 Provide the Chief, DESC-WE with recommendations for ES&OH Policy revisions. Support distribution of the ES&OH Policy through posting on DFSP bulletin boards, verbal communications, and other means.
DFSP superintendents	 As members of the ES&OH implementation team, endorse the ES&OH Policy and any future revisions. Recommend ES&OH Policy revisions to the QAR.
All DESC-WE staff and DFSP personnel	 Be aware of the ES&OH Policy and its goals and commitments, particularly as it pertains to their jobs.

4.0 Key Documents and Records

- DESC ES&OH Policy
- DESC ES&OH MS manual
- MP-08, Communication
- MP-10, Document Control
- MP-13, Performance Measurement and Monitoring
- MP-16, ES&OH MS Audit

Documents in **bold** are subject to document control procedures specified in MP-10, Document Control.

5.0	Review Checklist
	Has DESC published an ES&OH Policy?
	Is the Policy signed by senior management (DESC director)?
	Is the Policy appropriate to the nature, scale, and ES&OH risk of the DESC's activities, products, and services?
	Is the Policy supportive of DESC's mission?
	Does the Policy commit to compliance with all pertinent ES&OH requirements?
	Does the Policy commit to pollution prevention?
	Does the Policy commit to continually improving ES&OH performance?
	Does the Policy provide a framework for setting and reviewing objectives and targets?
	Is the Policy distributed to all DESC staff and contract personnel?
	Are DESC personnel at all levels familiar with the environmental goals and commitments defined in the Policy, especially as they pertain to their jobs?
	Is the Policy reviewed and revised, as appropriate, on a periodic basis?
	Is the Policy made available to interested parties?



MANAGEMENT PROCEDURE 02 ASPECTS, HAZARDS, AND RISK

1.0 Purpose

This procedure guides DESC personnel in documenting processes conducted at DESC facilities, identifying related environmental aspects and S&OH hazards, and determining and prioritizing associated risks to DESC's mission.

2.0 Definitions and Acronyms

Process

Unit operations supportive of the military mission that, due to some characteristic (aspect) they exhibit, can cause adverse impacts to the environment or personnel health and safety. Typical processes at DFSPs include fuel storage; pipeline O&M; ship, barge, and tanker off-loading; railcar loading and off-loading; truck loading and off-loading; and laboratory analyses of fuel samples.

Process Owner

The person, office, or department responsible for the day-to-day operation of a process.

Aspect (Environmental Aspect)

A characteristic of a process that can cause, in normal operation or upset mode, an environmental impact. Each process may have several aspects. Standard environmental aspects identified for DESC processes include:

- Air emissions
- Energy consumption
- Excavation near utilities
- Hazardous Materials (HM) use
- Hazardous Waste (HW) generation
- Natural resource consumption
- Noise generation
- Potable water-backflow/cross connection
- Soil erosion/disturbance
- Solid Waste (SW) generation: recyclable/non-recyclable
- Spill: fuel or chemical
- Stormwater discharge: non-point source
- Stormwater discharge: point source
- Universal waste generation
- Wastewater discharge: industrial waste
- Wastewater discharge: sanitary waste
- Water consumption: potable/non-potable

Hazard

A characteristic of a process that can cause, in normal or upset mode, an impact to worker health and safety (such as illness, injury, or death), or damage to the workplace environment or property. Standard hazards identified for DESC processes include:

- Biohazard
- Confined space/suffocation
- Crush
- Drowning
- Electrocution
- Explosion
- Fire
- Hazardous substance exposure: dermal contact
- Hazardous substance exposure: ingestion
- Hazardous substance exposure: inhalation
- Hazardous substance exposure: subcutaneous injection
- Lifting/ergonomic
- Noise
- Trip/fall/slip
- Vehicle accident
- Weather

Impact

The effect of a process's environmental aspects or S&OH hazards on environmental or S&OH resources.

Environmental Resource

Sensitive environmental receptors (e.g., air, water, natural resources, etc.) or cultural or historic assets on or around a DESC facility that can be impacted by DESC's operations.

S&OH Resource

The health and safety or general well-being of DESC employees or others who may be impacted by DESC's operations, including environmental or workplace conditions that can contribute to personnel health and safety.

Risk to Mission

Adverse effects on mission readiness resulting from environmental or S&OH impacts. Possible risks to mission include regulatory scrutiny; fines, penalties, or incarceration; criminal and civil investigations; spill cleanup or other corrective action costs; adverse public perception; litigation and lawsuits; accidents, injuries, or illnesses; and decreased job performance.

REVISION 1.2

REVISION DATE: 2/01/2005

3.0 Procedure

3.1 Discussion

DESC facilities operate numerous industrial activities to meet mission requirements. These activities include unit processes such as aboveground storage tank (AST) operation, pipeline tightness testing, or vehicle washing. Mission-supporting unit processes that can interact with the environment or worker health and safety are called "processes."

Understanding how a process interacts with the environment or worker health and safety, i.e., understanding applicable aspects and hazards, is essential to safe and environmentally sound operation of the process.

DESC-WE personnel, with support from the QARs, superintendents, and process owners, develop an inventory of processes and associated aspects and hazards for each DFSP. The process inventory is critical to the ES&OH MS in several ways:

- It comprehensively identifies and documents the DFSP's processes, aspects, and hazards.
- It enables risk-based ranking of processes and aspects to support decision-making and allocation of resources.
- It enables assigning ES&OH risk control responsibilities and accountability to process owners and other non-environmental staff (see *MP-06*, *Structure and Responsibility*).
- It allows management to establish and maintain plans and procedures for identifying and responding to workplace incidents, accidents, mishaps, and emergency situations.
- It provides the basis for planning and scheduling ES&OH audits (see MP-13, Performance Measurement and Monitoring).
- It facilitates identification, cause analysis, and correction/prevention of compliance and management problems for related or similar processes across the DFSP (see *MP-14*, *Corrective and Preventive Action*).

Process Inventory

The process inventory is developed through:

- Review of existing management plans and manuals (e.g., the DFSP Operation and Maintenance (O&M) Manuals), permits, and inventories to gather information about identified processes and their hazards and aspects.
- Validation of process information through site visits and interviews with DFSP personnel.
- Compiling process, aspect, and hazard information in a spreadsheet or database.

The process inventory considers both routine and non-routine activities and those activities conducted by subcontractors or visitors. Baseline information for each process includes the following:

- Description of process
- Pertinent environmental media area(s)
- Process owner
- Location
- Environmental aspects
- S&OH hazards

The process inventory is a living document and is updated for each DFSP at least annually. As operational processes change, DESC-WE personnel revise the inventory accordingly.

Risk Analysis

Risk analysis assesses the severity and frequency of potential impacts to ES&OH resources. Identified risks are prioritized (ranked) to ensure that processes or aspects/hazards posing significant potential risk to DESC's mission are considered when determining local management priorities. Using the following methodology, DESC-WE personnel determine risks associated with each identified process.

Step 1: Considerations

Consider known information about the process or aspect/hazard, such as:

- Identified environmental aspects and safety hazards;
- Controls (training, inspections, emergency response procedures and equipment, operational and administrative procedures) applied to the process;
- Physical controls such as berms, fences, or personal protective equipment to limit the occurrence or severity of impacts, should an aspect or hazard occur;
- Sensitivity and proximity of potentially affected resources,
- The number of potentially affected personnel,
- Consequences to affected personnel from S&OH incidents or accidents,
- The duration and severity of any anticipated occurrence of an aspect or hazard, and
- Past experience with aspects/hazards of the process.

Step 2: Risk Analysis

For each identified aspect or hazard, select a score for each of the following risk parameters:

Parameter	Scores
Frequency (How likely or frequent does the aspect or hazard occur?)	 1 = Unlikely to occur, less than once per year 2 = Uncommon, once per year 3 = Common, once per month 4 = Likely, weekly or more frequently
Environmental Impact (If the aspect were to occur, how severe would the resulting impact to environmental resources be?)	0 = No impact 1 = Insignificant impact 2 = Minimal impact 3 = Moderate impact 4 = Significant impact
Regulatory impact (If the aspect were to occur, how severe would regulatory scrutiny/action be?)	0 = Not regulated 1 = In compliance 2 = Possible NOV 3 = Certain NOV 4 = Potential cease and desist order or other mission shut down
Public perception impact (If the aspect were to occur, how severe would public reaction be?)	 0 = No public interest 1 = Public interest 2 = Public concern 3 = Legal action pending or likely 4 = Current legal action or other mission shut down
Worker perception impact (If the aspect were to occur, how severe would worker reaction be?)	0 = No public interest 1 = Worker interest 2 = Worker concern 3 = Legal action pending or likely 4 = Current legal action or other mission shut down
Safety and ergonomic hazard impact (How severe are safety and ergonomic risks associated with the hazard?)	 0 = No threat to personnel or property 1 = Minimal threat to personnel or property, requiring first aid or minor supportive medical treatment 2 = Lost-workday injury or compensable injury, or minor property damage 3 = Permanent partial disability in excess of 3 months, or major property damage 4 = Death, permanent total disability, or loss of facility/asset
Health hazard impact (How severe are health risks associated with exposure hazards?)	 0 = No medical effect 1 = Temporary reversible illness requiring supportive treatment (e.g., eye irritation or sore throat) 2 = Temporary reversible illness with a variable, but limited, period of disability (e.g., metal fume fever) 3 = Permanent, non-severe illness or loss of capacity (e.g., permanent hearing loss) 4 = Permanent, severe, disabling, irreversible illness, or death (e.g., asbestosis or lung cancer)

Step 3: Risk Scores and Significance

Calculate risk scores for each ASPECT/HAZARD:

Risk score for each aspect or hazard = frequency x the sum of impacts.

Calculate risk scores for each **PROCESS**:

Risk score for each process = sum of risk scores for all of its aspects and hazards.

DESC-WE ES&OH program managers, in coordination with the QARs, as appropriate, develop risk scores for aspects and hazards or processes and prioritize risks through numerical ranking. The risk analysis and prioritization process is documented, and the results including any observed trends are communicated to DFSP personnel and DESC-F senior management. **Significant risks** are those that rank highest in the prioritization process. These are subject to development of ES&OH objectives and targets (see *MP-04*, *Objectives and Targets*).

Step 4: Periodic Review and Revision

Risk rankings are subject to change as DFSP processes or operations improve, the ES&OH MS evolves, or ES&OH performance improves. ES&OH program managers annually review the analysis and prioritization of risks to ensure they remain current. Additionally, the ES&OH program managers assess risks associated with any new or changing processes planned for a DESC facility or for planned ES&OH management programs (see MP-5, ES&OH Management Programs) or corrective or preventive actions (see MP-14, Corrective and Preventive Action).

3.2 Responsibilities

Person Responsible	Responsibility
ES&OH MS team	Remain aware of current prioritized risks, as communicated by the Chief, DESC-WE.
Chief, DESC-WE	 Ensure the process inventory is maintained and reflects new or changing processes operated on DESC facilities. Ensure ES&OH program managers review risk analysis on at least an annual basis. Communicate the results of risk analysis and prioritization (including annual updates) to the ES&OH MS team.
ES&OH program managers, DESC-WE	 Identify processes, aspects, and hazards at the DFSPs and maintain this information in the process inventory. Identify new or modified processes during visits to DFSPs or headquarters facilities. Coordinate with the OARs on maintaining the process inventory. Coordinate with the OARs in conducting an annual risk analysis of DESC processes and/or aspects/hazards. Prioritize risks as the basis for development of ES&OH objectives and targets (see MP-04, Objectives and Targets). Document the results of the risk analysis and prioritization exercise. Incorporate the results of risk analysis and prioritization into ES&OH inspections. (See MP-13, Performance Measurement and Monitoring.)

Person Responsible	Responsibility
QARs, DESC-WE	 Provide information on new or modified DFSP practices to DESC-WE program managers to facilitate maintenance of the practice inventory.
	 Coordinate with DESC-WE program managers on modifications to the practice inventory and/or risk ranking results.
DFSP superintendents	 Ensure participation of process owners developing and maintaining the process inventory and conducting risk analysis. Ensure information on new or modified processes within their authority is provided to QARs or ES&OH program managers for inclusion in the inventory.
DFSP process owners	 Provide information to superintendents and OARs on plans for new or modified processes. Identify any previously unrecognized aspects or hazards and report to the DFSP
	superintendent. Follow established ES&OH policies and procedures.

4.0 Key Documents and Records

- DESC ES&OH MS manual
- DESC Environmental Guide for Fuel Terminals
- DFSP O&M manuals and ES&OH management plans or permits
- Process inventory and risk analysis records
- MP-04, Objectives and Targets
- MP-05, ES&OH Management Programs
- MP-06, Structure and Responsibility
- MP13, Performance Measurement and Monitoring
- MP-14, Corrective and Preventive Action

Documents in **bold** are subject to document control procedures specified in MP-10, Document Control.



5.0 Review Checklist

Has DESC developed a process inventory for each of its DFSPs?
Does the process inventory include, for each process, a unique identifier, information on process owner and locations, and information on associated environmental aspects and S&OH hazards?
Is the process inventory updated periodically to reflect changes in process information?
Are DFSP personnel involved in development and maintenance of the process inventory?
Do DFSP personnel provide information on new, changing, or discontinued processes to DESC-WE staff?
Has DESC characterized risks associated with each process or aspect/hazard at each of its DFSPs?
Has DESC determined which processes or aspects/hazards pose the most significant risk to each DFSP's mission capability?
Are the results of risk analysis and prioritization used in setting ES&OH objectives and targets?
Are the results of risk analysis and prioritization reflected in priorities for ES&OH inspections and audits?
Have DESC-WE personnel sought input from the DFSP manager and key process owners at each DFSP in characterizing risks and determining significance?
Have DFSP managers and DESC-WE management been apprised of significant risks and trends in significant risks?

MANAGEMENT PROCEDURE 03

LEGAL AND OTHER REQUIREMENTS

1.0 **Purpose**

This procedure guides DESC-WE personnel in remaining knowledgeable of executive, Federal, state, local, DOD, and DLA ES&OH requirements that may affect DESC processes and programs. As a minimum, ES&OH MS performance standard, all DESC personnel must understand and comply with ES&OH requirements applicable to their jobs.

2.0 **Definitions**

ES&OH Requirement Legislation, regulation, or policy issued by any executive, Federal, state, local, DOD, or DLA authority that addresses environmental or S&OH considerations and requires action by DESC-WE.

3.0 **Procedure**

3.1 Discussion

ES&OH performance begins with compliance, and compliance begins with knowledge of requirements. To operate processes in a safe and environmentally sound manner, DESC personnel must be aware of all applicable legislative, regulatory, and policy requirements. Appendix A to the Environmental Guide for Fuel Terminals highlights Federal and DOD requirements applicable to the DFSPs.

DESC-WE ES&OH program managers use several data collection methods to track new and changing environmental regulations, including discussion with peers, conference attendance, correspondence with regulators, and review of regulatory bulletins and databases from Hazardous Technical Information Services (HTIS) and the Defense Environmental Network and Information Exchange (DENIX).

DESC-WE personnel track new and changing requirements and communicate pertinent information to DFSP staff. Significant changes affecting DFSP operations are communicated to DFSP staff through DESC-FP and potentially through modifications to the performance work statement governing DFSP contract operations. Communication is followed up through site visits, face-to-face discussion, and training between DESC-WE staff and DFSP employees.

Identification of new requirements may necessitate modifications to procedures documented in the DFSP O&M manuals, the Environmental Guide for Fuel Terminals, and in ES&OH management plans.

3.2 Responsibilities

Person Responsible	Responsibility
Chief, DESC-WE	Ensure that ES&OH program managers remain abreast of developments in requirements affecting their areas of expertise
DESC-FP	 Coordinate with DESC-WE personnel in developing modifications to DFSP contractor performance work statements necessary to comply with ES&OH requirements.
ES&OH program managers, DESC-WE	 Engage peers, contractors, and regulators in discussions regarding ES&OH regulations in order to remain informed of current and potential future changes to requirements.
	 Routinely search environmental websites and databases such as DENIX and HTIS to identify changes in relevant environmental policies and regulations.
	 Evaluate new and revised ES&OH requirements for applicability to DESC operations.
	■ Disseminate information on new ES&OH requirements to the QARs.
	 Coordinate required changes to performance work statements through DESC-FP.
QARs, DESC-WE	 Receive notification of new or changing requirements from DESC-WE program managers and coordinate, as appropriate, with DFSP superintendents.
DFSP superintendents	Coordinate with the QAR on any new or changing requirements
DFSP process owners and subcontractors	 Maintain awareness of the applicability of current ES&OH requirements to their jobs and their ability to operate in a safe and environmentally sound manner.
	 Read, understand, and follow guidance and SOPs issued to reflect changing rules or regulations, as received from DESC-WE ES&OH program managers.
	Operate in compliance with current ES&OH requirements.

4.0 Key Documents and Records

- U.S. EPA Federal Register notices
- State Register environmental notices
- DLA Environmental Policy, DLAM 6050.1 DLA Environmental Protection Manual
- DENIX website: https://www.denix.osd.mil/
- Appendix A to the DESC Environmental Guide for Fuel Terminals
- DESC ES&OH MS manual
- MP-07, Training, Awareness, and Competence
- MP-08, Communication
- MP-11, Operational Control

Documents in **bold** are subject to document control procedures specified in MP-10, Document Control.



5.0 Review Checklist

- ☐ Do DESC-WE ES&OH program managers track emerging and changing ES&OH requirements?
- ☐ Do DESC-WE ES&OH program managers determine applicability of new requirements to DESC DFSP operations?
- Do DESC-WE ES&OH program managers communicate information on new requirements and disseminate new or revised guidance, procedures, and training materials to DFSP personnel?
- Do process owners apply ES&OH guidance, procedures, and training materials to ensure they operate in a compliant, safe, and environmentally sound manner?

MANAGEMENT PROCEDURE 04

OBJECTIVES AND TARGETS

1.0 Purpose

This procedure guides DESC-WE personnel in developing and documenting ES&OH objectives and targets that support DESC's ES&OH Policy and continual performance improvements.

2.0 Definitions

Objective A statement that defines an end-state supporting DESC's ES&OH Policy.

Objectives must be achievable and measurable, and should be quantifiable when

practicable.

Target A detailed performance requirement that sets a limit, usually a quantity and/or a

time frame, for the achievement of an objective. An objective may have more than

one target.

3.0 Procedure

3.1 Discussion

ES&OH objectives and targets drive DESC's efforts to improve ES&OH performance and achieve the goals of the ES&OH Policy. Management system programs and responsibilities are designed to achieve targeted performance.

In establishing measurable and achievable ES&OH objectives and targets, DESC-WE considers:

- Consistency with goals of the ES&OH Policy;
- Legal and other requirements;
- Processes, aspects, and hazards that pose significant risks to DESC's mission; and
- Technical, financial, and operational feasibility.

DESC-WE has established a set of headquarters-level ES&OH objectives and targets consistent with external requirements and reflecting local priorities. The DESC-WE objectives and targets, documented in Attachment C to the ES&OH MS manual, are applicable across all levels and functions of DESC operations. DFSP-specific objectives are established by DESC-WE ES&OH program managers, in coordination with the QARs and superintendents, based on the results of risk analysis and prioritization conducted at each DFSP (see MP-02, Aspects, Hazards, and Risk).

Performance improvements specified in headquarters or DFSP-specific objectives and targets are achieved through planning and implementation of ES&OH management programs (see MP-05, ES&OH Management Programs).

With input from the QARs, DESC-WE program managers assess performance against established targets on a semi-annual basis (see MP-13, Performance Measurement and Monitoring). Results of the review are coordinated with the Chief, DESC-WE. The annual review of risk ranking and prioritization (see MP-02, Aspects, Hazards, and Risk) may suggest revisions to existing objectives or the need to establish new ones. Objectives that have been achieved may be replaced with new objectives, or more stringent targets may be applied.

Progress in meeting established objectives and targets is communicated by the Chief, DESC-WE to the ES&OH MS team and DESC senior management to support the annual management review of the ES&OH MS (see *MP-17*, *Management Review*). The ES&OH MS team also reviews and approves suggested revisions to existing objectives and targets prior to implementation.

3.2 Responsibilities

Person Responsible	Responsibility
Senior management DESC-WE and ES&OH MS team	 Remain aware of current ES&OH objectives and targets and progress in meeting them, through communication with the Chief, DESC-WE.
Chief, DESC-WE	 Approve new or revised ES&OH objectives and targets. Annually, brief the ES&OH MS team and DESC senior management on progress towards meeting DESC-wide and DFSP-level ES&OH objectives and targets. Receive semi-annual progress reports from ES&OH program managers on status of meeting objectives and targets.
ES&OH program managers, DESC-WE	 Establish, in coordination with the QARs, objectives and targets to drive ES&OH performance improvements at the DFSP. Semi-annually assess progress in meeting DESC-wide and DFSP-level objectives and targets. Review and revise, as appropriate. Report progress in achieving ES&OH objectives and targets to the Chief, DESC-WE on a semi-annual basis.
OARs, DESC-WE	 Coordinate with DESC-WE ES&OH program managers in establishing DFSP-level ES&OH objectives and targets. Coordinate any revision to objectives and targets. Support DESC-WE ES&OH program managers in implementing ES&OH management programs and in measuring progress in meeting objectives and targets. Coordinate current ES&OH objectives and targets with all DFSP superintendents.
DFSP superintendents	 Support the QARs in implementing ES&OH management programs and in measuring progress in meeting objectives and targets. Communicate current ES&OH objectives and targets to all DFSP staff and subcontractors.
All DESC-WE staff and DFSP personnel	 Be aware of ES&OH objectives and targets, and operate processes in a manner supportive of meeting them, as appropriate.

4.0 Key Documents and Records

- DESC-WE ES&OH objectives and targets
- DFSP-specific objectives and targets
- Records of semi-annual review of progress in meeting objectives and targets
- DESC ES&OH MS manual
- MP-02, Aspects, Hazards, and Risk
- MP-05, ES&OH Management Programs
- MP-13, Performance Measurement and Monitoring
- MP-17, Management Review

Documents in **bold** are subject to document control procedures specified in MP-10, Document Control.



5.0 Review Checklist

Are ES&OH objectives and targets established for each relevant level and function of DESC operations (headquarters and DFSPs)?
Do objectives and targets consider legal and other requirements?
Do objectives and targets support goals of the ES&OH Policy?
Do objectives and targets reflect significant aspects, hazards, processes and risks?
Are objectives and targets measurable?
Are objectives and targets achievable within technical, financial, and operational constraints?
Is progress in meeting objectives and targets assessed on a semi- annual basis?
Are objectives and targets reviewed on a semi-annual basis, and revised as appropriate?
Are objectives and targets coordinated and communicated between the program managers, QARs, superintendents, and DFSP employees?

MANAGEMENT PROCEDURE 05

ES&OH MANAGEMENT PROGRAMS

1.0 Purpose

The purpose of this procedure is to guide DESC-WE personnel in establishing and maintaining programs for achieving ES&OH objectives and targets.

2.0 Definitions

A documented course of action, with defined plans, resources, responsibilities, and authorities, which, when implemented, moves the implementing organization towards a desired end state.

Note that many mature ES&OH management programs are already in place at DESC headquarters and DFSPs.

3.0 Procedure

3.1 Discussion

ES&OH objectives and targets established through procedures defined in MP-04, ES&OH Objectives and Targets are met through the development and implementation of ES&OH management programs.

Not all actions defined in ES&OH management programs require central funding or outside assistance. Many changes in behavioral or administrative procedures can be implemented within the DFSP superintendent's authority and budget. In fact, locally authorized changes in behavioral or administrative procedures may be all that is needed to successfully meet many objectives and targets.

Implementation of some actions defined by management programs will, however, require external (central) funding or changes to the operating contractor's performance work statement for their implementation. Actions requiring funding are submitted with supporting documentation through the Maintenance, Repair and Environmental (MRE) program. Requests describing project scope and anticipated costs are submitted on Defense Department (DD) Form 1391 or environmental compliance worksheets. (For more information on DESC's funding request process, see Chapter 12 of the *Environmental Guide for Fuel Terminals.*)

DESC-WE program managers, coordinating with the QARs, develop ES&OH management programs by developing a plan of actions with defined milestones, resource needs, responsibilities, and authorities. Proposed management programs are submitted for review and approval to the Chief, DESC-WE, the ES&OH MS team, and the superintendent(s) of any affected DFSPs. Responsibilities and authorities to execute a proposed management program may be assigned to DESC or contract personnel at any function or level within the DESC organization. ES&OH management programs requiring changes to the DFSP operations contractor's performance work statement are submitted for coordination and action by DESC-FP.

Once implemented, management programs are reviewed on a semi-annual basis for their effectiveness in meeting the associated ES&OH objective and target. The review is coordinated with the semi-annual

review of the objectives and targets (see MP-04, ES&OH Objectives and Targets). Management programs found to be ineffective in achieving desired desired results, i.e., those that are not achieving targeted improvements in ES&OH performance, are revised accordingly. Additionally, ongoing management programs are reviewed to ensure they remain effective through changes to DESC mission, processes, goals/objectives/targets, and services.

3.2 Responsibilities

Person Responsible	Responsibility
ES&OH MS team	 Review and approve proposed ES&OH management programs, as coordinated through the Chief, DESC-WE.
Chief, DESC-WE	 Coordinate with the ES&OH MS team to approve proposed ES&OH management programs.
	 Participate with ES&OH program managers in a semi-annual review of management programs in place, to ensure they are achieving the desired performance improvements. Develop and implement revisions, as needed.
ES&OH program managers, DESC-WE	 Develop and document, in coordination with QARs, as appropriate, ES&OH management programs.
	 Provide documented, proposed management programs to the Chief, DESC-WE for coordination and approval.
	 Submit funding requests through the MRE program, as needed to implement approved ES&OH management programs.
	 Conduct a semi-annual review of existing management programs, to ensure they are achieving the desired results. Develop and implement revisions, as needed.
QARs. DESC-WE	 Coordinate with DESC-WE ES&OH program managers and the superintendents, as necessary, in developing and documenting ES&OH management programs.
	 Communicate information on new management programs to the superintendents.
	 Support the program managers in the semi-annual review of existing management programs, to ensure they are achieving the desired results.
DFSP superintendents	 Coordinate with the OARs, as appropriate, in developing and documenting ES&OH management programs.
	 Ensure management programs applicable at their DFSPs are effective implemented.
	 Support the OARs and program managers, as appropriate, in the semi-annual review of existing management programs.
All DESC-WE and DFSP personnel	■ Implement actions defined in ES&OH management programs, as assigned.

4.0 Key Documents and Records

- DESC-WE ES&OH objectives and targets
- DFSP-specific objectives and targets
- DESC Environmental Guide for Fuel Terminals
- DESC ES&OH MS manual
- MP-04, ES&OH Objectives and Targets
- MP-13, Performance Measurement and Monitoring

Documents in **bold** are subject to document control procedures specified in MP-10, Document Control.



5.0 Review Checklist

- Does DESC plan, document, and implement ES&OH management programs to achieve ES&OH objectives and targets?
- Do the management programs define necessary requirements and define milestones, resource needs, responsibilities, and authorities?
- Are actions requiring central funding submitted through the MRE program?
- Are actions requiring modifications to the DFSP contractor's performance work statement coordinated through DESC-FP?
- Do DESC-WE program managers review existing management programs for effectiveness in achieving objectives and targets?
- Are management programs found to be ineffective in meeting objectives and targets modified or enhanced accordingly?

MANAGEMENT PROCEDURE 06

STRUCTURE AND RESPONSIBILITY

1.0 Purpose

The purpose of this procedure is to guide DESC-WE personnel in facilitating ES&OH management by defining, documenting, and communicating roles, responsibilities, and authorities for personnel who manage, perform, and verify activities with associated ES&OH risks.

2.0 Definitions

Process Unit operations supportive of the military mission that, due to some characteristic

(aspect) they exhibit, can cause adverse impacts to the environment or personnel health and safety. Typical processes at DFSPs include fuel storage; pipeline operation and maintenance (O&M); ship, barge, and tanker off-loading; railcar loading and off-loading; truck loading and off-loading; and laboratory analyses on

fuel samples.

Process Owner The person, office, or department responsible for the day-to-day operation of a

process.

3.0 Procedure

3.1 Discussion

There are three categories of ES&OH MS responsibilities: implementation and maintenance of the management system, management of ES&OH programs, and control of processes, aspects, and hazards.

ES&OH MS Implementation and Maintenance

DESC's ES&OH MS team, established by DESC Memo (12 July 2004), is a two-tiered body:

- The management team includes the ES&OH MS management representative, Chief-DESC-WE, DESC-WE program managers, and the Commanders of DESC Americas East and West.
- The implementation team includes superintendents of the five DFSPs.

The team supports, oversees, and annually reviews DESC's ES&OH MS (see MP-17, Management Review), and supports the DESC Director in ensuring coordination among DESC organizations. Specific responsibilities assigned to the team include:

- Evaluating environmental aspects and S&OH hazards of DESC's operations;
- Defining achievable ES&OH objectives and targets;
- Coordinating ES&OH training and related activities; and
- Conducting a periodic ES&OH MS management review, and implementing corrective/preventive actions.

DESC has also designated an **ES&OH MS management representative**, who is responsible for ensuring that:

- ES&OH MS requirements are planned, implemented, and maintained;
- The management system is performing to requirements throughout all functions and levels of DESC's organization; and
- Reports of ES&OH performance are presented, through the Chief, DESC-WE, to DESC Senior Management.

DESC-WE and DFSP personnel are responsible for ES&OH MS planning, implementation, operation, and improvement. Detailed responsibilities are documented in the ES&OH MS manual and these management procedures.

ES&OH Program Management

DESC-WE ES&OH programs ensure compliance with Federal, state, and local ES&OH requirements and DOD, DLA, and DESC ES&OH policies. DESC ES&OH programs include:

- Leak Detection
- Compliance Funding
- Pollution Prevention
- Environmental and S&OH Audits
- Spill Response and Cleanup
- Training
- Hazard Communication
- Confined space entry
- Lock-out/Tag-out
- Personal Protective Equipment
- Hazardous Waste Operations and Emergency Response
- DOT Safe Transportation of Hazardous Materials
- Ergonomics
- QAS Medical Surveillance Program (government employees only)

DESC-WE is responsible for managing the ES&OH programs. Detailed program management responsibilities are described in numerous DESC ES&OH documents, including:

- The Environmental Guide for Fuel Terminals,
- DFSP O&M manuals,
- DESC-wide and DFSP ES&OH management plans, and
- Position descriptions for DESC-WE personnel.

Access to and maintenance of ES&OH documentation are further discussed in MP-10, Document Control.

Process Control

DFSP superintendents and process owners are primarily responsible for control of the environmental aspects and S&OH hazards of the processes they operate. DESC-WE program managers and QARs assume support and oversight roles. Detailed responsibilities for safe and environmentally sound operation of DESC processes are defined in the DFSP O&M manuals, ES&OH management plans, *Environmental Guide for Fuel Terminals*, and contractor's performance work statements.

3.2 Responsibilities

Person Responsible	Responsibility
DESC ES&OH MS team	 Demonstrate commitment to ES&OH performance and to continual improvement of the ES&OH MS.
	Support, oversee, and annually review DESC's ES&OH MS.
	 Assess environmental aspects and S&OH hazards of DESC's energy support operations.
	 Define achievable ES&OH objectives and targets.
	Coordinate ES&OH training and related activities.
	 Conduct the annual ES&OH MS management review.
	 Meet specific ES&OH MS responsibilities as defined in the ES&OH MS manual and these management procedures.
DESC ES&OH MS	Participate on the ES&OH MS team.
management representative	 Ensure that ES&OH MS requirements are planned, implemented, and maintained.
	 Ensure that the ES&OH MS is meeting performance requirements throughout all functions and levels of DESC's organization.
	 Ensure that reports of ES&OH performance are presented, through the Chief, DESC-WE, to DESC senior management as a basis for continual improvement.
	 Maintain a current inventory of ES&OH records controlled under the ES&OH MS.
	 Conduct the annual ES&OH MS internal review of DESC-WE.
	 Meet specific ES&OH MS responsibilities as defined in the ES&OH MS manual and these management procedures.
Chief, DESC-WE	Participate on the ES&OH MS team.
	 Provide a liaison to DESC senior management to ensure effective communication of ES&OH MS information, as required throughout these management procedures.
	 Oversee DESC-WE ES&OH staff, in accordance with responsibilities defined in the ES&OH MS manual.
	 Meet specific ES&OH MS responsibilities as defined in the ES&OH MS manual and these management procedures.

Person Responsible	Responsibility
Commanders, Americas East and West	 Participate on the ES&OH team. Ensure the ES&OH MS requirements are communicated to staff throughout the regional offices. Meet specific ES&OH MS responsibilities as defined in the ES&OH MS manual and these management procedures.
ES&OH program managers, DESC-WE	 Participate on the ES&OH MS team, as assigned. Manage DESC's ES&OH programs. Meet specific ES&OH MS responsibilities as defined in the ES&OH MS manual and these management procedures.
QARs, DESC-WE	 Provide a liaison between DESC and the site superintendent for all ES&OH coordination. Meet specific ES&OH MS responsibilities as defined in the ES&OH MS manual and these management procedures.
DFSP superintendents	 Participate on the ES&OH MS team. Meet specific ES&OH MS responsibilities as defined in the ES&OH MS manual and these management procedures. Coordinate with DESC-WE QARs and program managers to ensure effective implementation of DESC ES&OH programs. Ensure safe and environmentally sound operation of processes on their DFSPs. Conduct S&OH inspections, accident investigations, and incident reporting.
DFSP process owners and subcontractors	 Operate processes in a safe and environmentally sound manner in accordance with procedures defined in the DFSP O&M manuals, ES&OH Program Management Plans, and the contractor's performance work statement. Meet specific ES&OH MS responsibilities as defined in the ES&OH MS manual and these management procedures.

4.0 Key Documents and Records

- DESC Memo, Environmental, Safety and Occupational Health Management System (ES&OH MS). Appointment of Implementation Team and Management Team, 12 July 2004
- DESC Environmental Guide for Fuel Terminals
- Position descriptions for DESC-WE personnel
- DFSP O&M manuals
- DESC-wide and DFSP ES&OH management plans
- DESC ES&OH MS manual
- MP-10, Document Control
- MP-17, Management Review

Documents in **bold** are subject to document control procedures specified in MP-10, Document Control.



5.0 Review Checklist

□ Has DESC established an ES&OH MS team?
 □ Does DESC senior management and the ES&OH MS team demonstrate commitment to continual improvement of the ES&OH MS and ES&OH performance?
 □ Has DESC designated an ES&OH MS management representative?
 □ Does DESC define, document, and communicate roles, responsibilities, and authorities for personnel who manage, perform, and verify activities with associated ES&OH risks?
 □ Does DESC senior management provide resources essential to planning, implementing, operating, maintaining, and improving the ES&OH MS?
 □ Are responsibilities for effective ES&OH program management documented in ES&OH MS documentation?
 □ Are responsibilities for safe and environmentally sound operation

of DESC processes documented in ES&OH MS documentation?

MANAGEMENT PROCEDURE 07

TRAINING, AWARENESS, AND COMPETENCE

1.0 Purpose

The purpose of this procedure is to ensure that all DESC personnel are competent, by means of appropriate education, training, or experience, to perform tasks with associated ES&OH risks. The procedure ensures that ES&OH training and awareness needs are identified, and that training is provided and documented.

2.0 Definitions

None.

3.0 Procedure

3.1 Discussion

Competence of DESC employees, achieved through education, training, or experience, is essential to the safe and environmentally sound operation of DESC activities. Both DESC-WE and DFSP-level employees are subject to competence requirements. Several types of ES&OH training contribute to the competence of DESC employees:

- Training to promote general ES&OH awareness,
- Training necessary to achieve effectively plan, implement, and maintain the ES&OH MS,
- Training required to comply with ES&OH regulations, and
- Training in the operation of DESC processes and control of their associated aspects and hazards.

Training is also closely related to communication (see MP-08, Communication) and documentation and recordkeeping (see MP-09, Documentation and MP-15, Records).

ES&OH MS and General ES&OH Awareness

DESC personnel receive general ES&OH awareness training, including general ES&OH MS awareness, during orientation at the start of their employment. DESC-WE personnel ensure that ES&OH awareness material in the orientation curriculum is adequate to meet the goals of the management system. In addition, ES&OH training is provided to personnel transferring to new positions requiring new duties. ES&OH MS awareness training was provided to key DFSP staff during ES&OH MS implementation. DESC-WE personnel reemphasize the importance of meeting ES&OH requirements through an effectively implemented and maintained ES&OH MS, during annual ES&OH MS audits and other site visits.

Regulatory Required ES&OH Training

DESC's fuel handling operations are subject to a variety of regulatory training requirements. DESC-WE ES&OH program managers maintain an inventory of required ES&OH training for DESC employees. An ES&OH training plan detailing required ES&OH training is provided as Attachment E to the

ES&OH MS manual. Information in Attachment E is derived from the DLA Environmental Hazardous Material/Hazardous Waste Training Plan, which provides an excellent reference for ES&OH training required for DESC civilian and agency personnel. The DLA Training Plan may be found online at http://www.dtc.dla.mil/env/.

Section 9 of the *Environmental Guide for Fuel Terminals* outlines environmental training programs available to DFSP personnel and details courses available and recommended attendees. Additionally, the DFSP superintendents are responsible for providing confined space training to DFSP employees. Confined space training is offered by DESC at Houston and Fort Belvoir. Training is available through a variety of resources, including:

- DLA- or DESC-approved courses (see Section 9 of the *Environment Guide for Fuel Terminals* and the DLA Environmental Training Plan).
- The Defense Environmental Network and Information Exchange (DENIX) 'Training Resources Web Search, providing a directory of over 4,000 courses in environmental education and training.
- Army Environmental Awareness Resource Center.
- DLA Civilian Personnel Support Office.
- Locally developed training delivered by DESC personnel or a contractor.
- Distance learning courses (correspondence, CD, video, teleconferencing, or Internet).
- Short briefings, training sessions, videos addressing on-the-job training, safety stand downs, or stand up meetings.
- Use of these management procedures or standard operating procedures contained in the DFSP O&M manuals, fact sheets, articles, websites, or other local documentation-based methods.
- Direct interface between ES&OH program managers and process owners.

ES&OH training records of DFSP staff are maintained at the DFSPs in accordance with the DESC-WE File Management Plan (see Enclosure A of *MP-10*, *Document Control*) and also provided to DESC-WE (see *MP-15*, *Records*). DESC-WE personnel audit training records during DFSP compliance audits.

Job-Specific Training

The contractual nature of DFSP management ensures competent operation of fuel handling processes. The DFSP contractor's performance work statement stipulates specific requirements for environmental competence for DFSP superintendents, and DFSP operators are hired based on demonstrated competence in operating fuel storage and transfer equipment.

DESC process owners are assigned specific responsibilities for the safe and environmentally sound operation of their processes. Environmental aspects and safety hazards associated with DFSP processes and ES&OH MS responsibilities for process owners are detailed in the O&M manuals, the ES&OH MS manual, and these management procedures, all of which are available to DFSP staff for review.

3.2 Responsibilities

Person Responsible	Responsibility
DESC ES&OH MS team	Coordinate ES&OH training and related activities.
Chief, DESC-WE	 Maintain, with support from ES&OH program managers, the inventory of training requirements for DESC employees.
ES&OH program managers, DESC-WE	 Receive detailed ES&OH MS training. Provide initial ES&OH MS awareness training to DFSP staff during ES&OH MS implementation. Continually encourage ES&OH MS awareness during compliance inspections and other site visits. Ensure that ES&OH and ES&OH MS awareness material provided to DFSP staff during orientation is adequate to the needs of the ES&OH MS. Support the Chief, DESC-WE in maintaining an inventory of required training for DESC employees. Support continuing training and awareness of DFSP employees through development and dissemination of guidance, procedures, and other ES&OH documents. Provide informal training and technical assistance during site visits. Receive and maintain required ES&OH training pertinent to their program responsibilities. Maintain personal training records as required by regulation and policy. Receive and maintain training records from DFSP employees. Assess competence of DFSP employees to operate in a safe and environmentally sound manner through review of training records and interviews during compliance inspections and other site visits.
QARs, DESC-WE	 Receive and maintain required ES&OH training pertinent to their program responsibilities.
DFSP superintendents	 Remain competent, through education, training, and experience to manage DFSP operations and staff in an effective, safe, and environmentally sound manner. Ensure DFSP staff remains competent to operate processes in an effective, safe, and environmentally sound manner. Receive ES&OH MS training during ES&OH MS implementation initiatives. Maintain awareness through ongoing training and awareness initiatives in the workplace.
DFSP process owners	 Remain competent, through education, training, and experience to operate processes in an effective, safe, and environmentally sound manner. Ensure regulatory required training certifications remain current. Maintain personal training records, as required by regulation or policy. Receive general ES&OH awareness training at start of employment. Maintain awareness through ongoing training and awareness initiatives in the workplace.

4.0 Key Documents and Records

- DLAI 4715.10, DLA Environmental Hazardous Material/Hazardous Waste Training Plan
- DFSP O&M manuals
- DESC ES&OH MS manual
- DESC training inventory
- Training records for DFSP and DESC-WE staff
- DESC-wide and DFSP ES&OH management plans
- DESC File Management Plan
- MP-08, Communication
- MP-09, Documentation
- MP-10, Document Control
- MP-13, Performance Measurement and Monitoring
- MP-15, Records

Documents in **bold** are subject to document control procedures specified in MP-10, Document Control.

5.0 **Review Checklist** Are DFSP level personnel competent to perform tasks in a safe and environmentally sound manner? Are DFSP staff aware of the DESC ES&OH Policy and ES&OH MS objectives and targets, as they pertain to their jobs? Are DFSP personnel aware of significant environmental aspects and S&OH hazards associated with their processes? Are DFSP personnel aware of the importance of conformance with ES&OH Policy and procedures, as well as their roles and responsibilities in achieving and maintaining conformance? Do DESC and DFSP personnel maintain training and certifications pertinent to their jobs, as required by regulations? Are training records maintained in accordance with regulatory requirements and DESC's File Management Plan? Have DESC staff received general ES&OH awareness training and periodic updates? Have DESC staff received general ES&OH MS awareness training and periodic updates? Have DESC-WE staff and DFSP superintendents received detailed ES&OH MS training? Do the Chief, DESC-WE and ES&OH program managers maintain an inventory of ES&OH training required for DESC employees?



MANAGEMENT PROCEDURE 08

COMMUNICATION

1.0 Purpose

This procedure guides DESC personnel in ensuring that pertinent ES&OH information is communicated to and from employees and other interested parties.

2.0 Definitions

Internal Communication

Communication of ES&OH information between personnel at various functions and levels of DESC's organization, including DLA.

External Communication

Communication of ES&OH information with external parties, such as the public, interest groups, and regulators, including receiving, documenting, and responding to inquiries from external parties.

3.0 Procedure

3.1 Discussion

Effective communication of ES&OH information between DESC personnel at all functions and levels and with external stakeholders is essential to the success of DESC's ES&OH MS.

Internal Communication

The DESC ES&OH MS places a high priority on communication as a way to integrate ES&OH considerations into day-to-day-business. Effective communication involves not only the dissemination of information but the receipt of information as well; communication is thus closely related with ES&OH training and awareness (see MP-07, Training, Awareness, and Competence).

Primary internal communication routes include e-mail for government employees and coordination through the DESC-WE QARs or DESC-FP for DFSP staff. DESC-WE personnel communicate directly with DFSP staff on minor issues. Communication is reinforced by "face-time" during site visits and annual audits and augmented through the dissemination of ES&OH documents, such as the DESC *Environmental Guide for Fuel Terminals*, the DFSP O&M manuals, and the ES&OH MS manual. The DESC intranet provides an additional venue for the transfer of information.

Communication between the Chief, DESC-WE and ES&OH program managers occurs as part of day-to-day business and within formal meetings or forums.

Communication will often be required to coordinate ES&OH MS-related actions across DESC functional lines. In some situations, direct communication between organizations occurs verbally or via telephone or e-mail. Difficult issues may require resolution within the ES&OH MS team or through coordination with DESC senior management.

DFSP contractors are included at a corporate level in changes to operating procedures, via the performance work statements. Contractors are also significantly involved in the development and revision of the DFSP O&M manuals. The DFSP superintendents are included in the development and

implementation of ES&OH management programs to meet ES&OH objectives and targets (see MP-05, ES&OH Management Programs) and corrective and preventive actions (see MP-14, Corrective and Preventive Actions).

External Communication

The ES&OH MS also emphasizes openness regarding ES&OH issues with external stakeholders, such as regulators and the public. Open communication with external stakeholders increases their trust in DESC's ability to operate in a safe and environmentally sound manner.

Communication with the public occurs primarily through existing channels such as Restoration Advisory Board (RAB) meetings and inclusion of the public on OPA-90 and other emergency preparedness and response exercises.

DESC is subject to numerous regulatory requirements for periodic reporting on ES&OH compliance. Required reporting is addressed in Chapter 11 of the *Environmental Guide for Fuel Terminals*.

DESC-WE ES&OH program managers represent the DFPSs when coordinating with environmental regulatory agencies. Regulators do not have access to the DFSPs without prior communication with ES&OH program managers, and the performance work statements preclude direct coordination between regulators and DFSP contractors.

3.2 Responsibilities

Person Responsible	Responsibility
DESC ES&OH MS team	 Resolve ES&OH issues that affect multiple DESC organizations.
Chief, DESC-WE	 Communicate ES&OH information to ES&OH program managers and QARS, the ES&OH MS team, and DFSP staff.
	 Communicate with DESC-FP regarding significant operational changes for modification of the DFSP contractor's performance work statement.
	 Serve as liaison between DESC-WE and DLA, and other interested DLA organizations.
Chief, DESC-FP	 Coordinate modifications to DFSP contractor's performance work statement, when necessary to implement significant operational changes resulting from ES&OH MS improvements.
ES&OH management representative	 Serve as liaison between DESC-WE and the ES&OH MS team.

Person Responsible	Responsibility
ES&OH program managers, DESC-WE	 Communicate with the Chief, DESC-WE and ES&OH MS team members on new or revised ES&OH issues or requirements.
	Coordinate with regulatory agencies for DFSP site visits and other inquiries.
	 Coordinate communication with the public on ES&OH issues through RAB meetings and emergency preparedness and response exercises.
	 Document communication received from regulatory agencies, the public, or other external interested parties.
	 Communicate ES&OH technical information and minor operational changes resulting from ES&OH MS improvement initiatives to DFSP staff.
	 Communicate with the DFSP superintendents to track personal accidents, illnesses, injuries, and mishaps to support development of programs to reduce their occurrence and significance.
Commanders, Americas East and West	 Coordinate, as required, communication between headquarters DESC-WE, DESC-FP, and QARs at DFSPs within their region.
QARs, DESC-WE	 Serve as liaison between headquarters DESC-WE or regional commanders and the superintendents.
DFSP superintendents	 Communicate with DESC-WE program managers directly or through the QARs on issues affecting ES&OH performance.
	Participate in the development of ES&OH management programs.
	 Track all DFSP personnel accidents, illnesses, injuries, and mishaps and communicate this information to the QAR on a periodic basis.
DFSP process owners	Participate in development of revisions to the DFSP O&M manuals.
	 Communicate with ES&OH program managers regarding ES&OH technical information and minor operational changes resulting from ES&OH MS improvement initiatives.
	 Communicate with DFSP superintendents and the OAR regarding ES&OH policies and procedures to assist in managing workplace risks.

4.0 Key Documents and Records

- DESC Environmental Guide for Fuel Terminals
- DFSP O&M manuals
- DESC ES&OH MS manual
- Communication logs and minutes of public meetings
- MP-05, ES&OH Management Programs
- MP-07, Training, Awareness, and Competence
- MP-10, Document Control
- MP-14, Corrective and Preventive Actions

Documents in **bold** are subject to document control procedures specified in MP-10, Document Control.



5.0 Review Checklist

Is pertinent ES&OH information communicated to and from DESC employees at all levels and functions and other interested parties?
Are DFSP-level personnel involved in the development of ES&OH environmental programs to meet ES&OH objectives and targets?
Are DFSP-level personnel consulted in developing revisions to DFSP O&M manuals?
Do ES&OH program managers communicate with DFSP employees on ES&OH technical issues and minor operational changes?
Do ES&OH program managers coordinate communications with the public and regulatory agencies?
Does DESC-FP coordinate modifications to the DFSP contractor's performance work statements?
Does the ES&OH MS management representative act as a liaison between DESC-WE and the ES&OH MS team?
Does the ES&OH MS team serve as a forum for resolution of ES&OH issues affecting multiple DESC organizations?

MANAGEMENT PROCEDURE 09

DOCUMENTATION

1.0 Purpose

This procedure guides DESC personnel in maintaining documentation that describes the elements of the ES&OH MS, and the relationships between them and provides direction to other ES&OH MS documentation.

2.0 Definitions

None.

3.0 Procedure

3.1 Discussion

As a "roadmap" to ES&OH programs, personnel, procedures, and documentation, the ES&OH MS manual plays a central role in implementing and maintaining the ES&OH MS. ES&OH management procedures (MPs) in ES&OH MS manual describe each management system elements and the relationships between them. The manual includes DESC's ES&OH Policy, objectives and targets, and training plan as attachments. The manual also references other controlled ES&OH MS documents (see MP-10, Document Control), such as the DFSP O&M manuals and ES&OH management plans.

The ES&OH MS manual is reviewed on an annual basis and revised to ensure its continuing adequacy in supporting the ES&OH Policy. Improvements identified through monitoring and measurement (see MP-13, Performance Monitoring and Measurement) and corresponding corrective actions (see MP-14, Corrective and Preventive Action), the ES&OH review and audit (see MP-15, ES&OH MS Audit), and management review (see MP-17, Management Review) often drive modifications to ES&OH MS documentation. DESC-WE's management representative receives and records suggestions for improvement, ensures that the ES&OH MS team is aware of the suggestions, and maintains document control of the ES&OH MS manual.

In addition to controlled revisions of the ES&OH MS manual on the DESC intranet (see *MP-10*, *Document Control*), DESC-WE's management representative and QARs and the DFSP superintendent maintain paper copies. The manual is available for review by any DESC employee.

3.2 Responsibilities

Person Responsible	Responsibility
DESC ES&OH MS team	 Remain aware of significant modifications to the ES&OH MS manual, as communicated by the ES&OH MS management representative.
Chief, DESC-WE	 Ensure that the ES&OH MS manual is reviewed on an annual basis and revised to remain adequate in supporting the ES&OH Policy.
ES&OH management representative	 Maintain the ES&OH MS manual. Ensure that the current revision of the ES&OH MS manual is posted on the DESC intranet and maintained in paper form at DESC-WE and the DFSPs. Track suggested revisions to the ES&OH MS manual and develop modifications resulting from the annual review. Coordinate significant revisions to the ES&OH MS manual with the ES&OH MS team.
ES&OH program managers, DESC-WE	Manage ES&OH programs and maintain the ES&OH MS in accordance with the current ES&OH MS manual and included management procedures.
QARs, DESC-WE	 Maintain a current hard copy of the ES&OH MS manual and make it available to all DFSP employees for review.
DFSP superintendents	 Maintain a current hard copy of the ES&OH MS manual and make it available to all DFSP employees for review. Manage DFSP ES&OH programs and maintain the ES&OH MS in accordance with the current ES&OH MS manual and included management procedures.
DFSP process owners	Remain familiar with the ES&OH MS manual, especially sections pertinent to their jobs.

4.0 Key Documents and Records

- DESC ES&OH MS manual
- MP-10, Document Control
- MP-13, Performance Monitoring and Measurement
- MP-14, Corrective and Preventive Action
- MP-15, ES&OH MS Audit
- MP-17, Management Review

Documents in **bold** are subject to document control procedures specified in MP-10, Document Control.

5.0 **Review Checklist** Does DESC's ES&OH MS manual describe the ES&OH MS elements and the relationships between them? Does the ES&OH MS manual provide direction to related ES&OH documentation? ☐ Is the ES&OH MS manual reviewed and revised on an annual basis to ensure its continued adequacy in supporting the ES&OH Policy? Is the current revision of the ES&OH MS manual maintained on the DESC intranet? Are hardcopies maintained by the DESC-WE management representative and by QARs and and superintendents at the DFSPs? Is the ES&OH MS manual available for review by any DESC employee?



MANAGEMENT PROCEDURE 10

DOCUMENT CONTROL

1.0 Purpose

This procedure guides DESC personnel in managing controlled ES&OH documents.

2.0 Definitions

ES&OH Documents ES&OH documents contain instructions or information regarding operation of the

ES&OH MS, management of ES&OH programs, and control of processes. As the management system matures, information in ES&OH documents is subject to change. Examples of ES&OH documents include this ES&OH MS manual, DFSP O&M manuals, ES&OH management plans, and most of the other references

cited in these MPs.

Document Control All actions taken regarding documents from creation to final disposition, including

creation, retention, storage, revision, revision control, disposal, and permanent

archiving.

3.0 Procedure

3.1 Discussion

Management of documents includes:

- Identifying ES&OH documents to be managed;
- Identifying applicable regulatory and policy requirements for document content, format, management, and authorization (see MP-03, Legal and Other Requirements);
- Ensuring adequate revision control, including availability of current revisions to appropriate DESC staff for review or use;
- Ensuring that current documents are stored at appropriate locations;
- Ensuring that obsolete documents are removed from circulation, archived, or disposed of, as appropriate; and
- Ensuring that timely revision of regulatory required ES&OH program management plans and renewal of permits.

DESC-WE and the DFSPs have developed numerous ES&OH management plans and obtained permits as required by regulations and DLA policy. Both plans and permits are generally subject to requirements for periodic revision or renewal.

Copies of plans, instructions, permits, and other controlled environmental documents are maintained at DESC-WE headquarters and regional offices, and at DFSP QAR and superintendents' offices. Electronic documents are maintained on DESC's intranet website.

DESC's document control system ensures that:

- ES&OH documents are readily available, and their locations and status are known, and
- Personnel requiring access to ES&OH documents have the most up-to-date issues.

The following document control procedures apply:

- The ES&OH MS management representative maintains a current inventory of ES&OH documents controlled under the ES&OH MS including ES&OH management plans, manuals, and permits (see DESC's File Management Plan in Enclosure A to this management procedure). The document inventory also includes ES&OH MS records. (See MP-15, Records).
- All ES&OH MS controlled documents subject to revision are clearly marked with a revision number. Each revision is issued a new, sequential revision number. Previously uncontrolled documents subject to these requirements are marked with revision numbers during their next periodic update.
- Electronic revisions of all documents identified in the document inventory are considered to be *the* current, controlled revisions. Electronic revisions are maintained on the DESC intranet website. Paper copies are uncontrolled documents, by default.
- Paper revisions of ES&OH documents are clearly marked "UNCONTROLLED", and are
 maintained in accordance with DESC's File Management Plan (which addresses management of
 both ES&OH documents and records). See MP-15, Records for applicability of the File
 Management Plan to ES&OH records.
- Paper documents are removed from circulation and replaced with current revisions upon issue of the new revision.
- The ES&OH MS management representative provides training for all DESC-WE personnel who
 develop or control ES&OH documents to ensure that they are aware of the document control
 process. ES&OH program managers communicate document control requirements to DFSP staff.

3.2 Responsibilities

Person Responsible	Responsibility
Chief, DESC-WE	Ensure that DESC-WE personnel maintain ES&OH documents in accordance with the DESC File Management Plan.
ES&OH MS management representative	 Maintain a current inventory of ES&OH documents controlled under the ES&OH MS.
ES&OH program managers, DESC-WE	 Maintain DESC-WE documents in accordance with the DESC File Management Plan.
	 Update ES&OH documents within their control periodically in accordance with regulatory requirements.
	 Ensure that obsolete revisions of documents under their control are removed from circulation and replaced by current revisions.
	 Renew ES&OH permits within their control as required by regulations and permit requirements.
QARs, DESC-WE	 Maintain ES&OH controlled documents in accordance with the DESC File Management Plan.
DFSP superintendents	 Maintain ES&OH controlled documents in accordance with the DESC File Management Plan.

4.0 Key Documents and Records

- DESC ES&OH MS manual
- DESC File Management Plan
- All DESC ES&OH controlled documents
- MP-15, Records

Documents in **bold** are subject to document control procedures specified in MP-10, Document Control.



5.0 Review Checklist

- ☐ Do DESC-WE and DFSP personnel maintain ES&OH documents in accordance with the DESC File Management Plan?
- Does the ES&OH MS management representative maintain the inventory of ES&OH MS controlled documents?
- Are ES&OH documents and permits updated or renewed in accordance with regulatory or permit requirements?
- Are ES&OH MS documents reviewed and revised periodically in accordance with timelines specified in these management procedures?
- Can DESC-WE and DFSP personnel locate and access current revisions of ES&OH documents as needed?
- Are obsolete revisions of ES&OH documents removed from circulation and replaced by current revisions?

ENCLOSURE A

DESC File Management Plan for ES&OH MS Documents and Records

Documents and records identified in this File Management Plan are considered to be controlled documents within the ES&OH MS and are subject to the requirements of *MP-10*, *Document Control*. These files shall be made available for inspection by Government personnel, auditors, and regulators upon request. ES&OH MS documents are indicated in **bold-face**. Records are indicated in non-bolded font.

Subject Area	Controlled ES&OH Documents and Records
ES&OH MS-specific documents	ES&OH Policy. (Annual review)
and records	ES&OH objectives and targets (see MP-04, Objectives and Targets). (Semi-annual review)
	ES&OH MS manual. (Annual review)
	DFSP O&M manuals
	Environmental Guide for Fuel Terminals
	Process, aspect, and hazard inventories. (Annual review)
	DESC File Management Plan (see MP-10, Document Control)
	Compliance inspection checklists
	Point of use inspection checklists
	Risk analysis records (see MP-02, Aspects, Hazards, and Risk)
	Communication records (see MP-08, Communication)
	Emergency preparedness and response exercise records (see MP-12, Emergency Preparedness and Response)
	Compliance inspection records (see MP-13, Performance Measurement and Monitoring)
	Monitoring equipment maintenance and calibration records (see MP-13, Performance Measurement and Monitoring)
	Problem solving documentation (see MP-14, Corrective and Preventive Action)
	ES&OH MS audit and internal review records (see MP-13, Performance Measurement and Monitoring and MP-16, ES&OH MS Audit)
	Management Review records and minutes of ES&OH MS team meetings (see MP-17, Management Review)
Superfund Amendment Reauthorization Act (SARA)	Tier I/Tier II Emergency and Hazardous Chemical Inventory Reports (SERC, LEPC, Fire Dept.)
	Form R Toxic Chemical Release Inventory Report Form
	State Inspections/Investigations Records
	Aboveground Tank Inspection Records
	Underground Tank Inspection Records
	Pipeline Inspection Records
	Pressure Test Records
	Above and Underground Storage Annual Throughput Report
	Notice of Violations

Subject Area	Controlled ES&OH Documents and Records
Resource Conservation and Recovery Act (RCRA)	RCRA Permit Hazardous Waste Minimization Plan Pollution Prevention Plan Underground Storage Tank Permits State Inspections/Investigations Records Hazardous Waste Manifests Non-Hazardous Waste Manifests Biennial Report Waste Profile Sheets Landfill Records Notice of Violations Spill Reports
Clean Air Act (CAA)	State Air Emission Permit State Inspections/Investigations State Point Source Data Report Air Emission Inventory Air Emission Reports Notice of Violations
Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)	Pesticide Management Plan Insecticide, Pesticide, Rodenticide Reports (see Clause C-2.3.1.8.4) State Inspections/Investigations Notice of Violations
Clean Water Act (CWA)	State NPDES Permit POTW Discharge Permit Stormwater Pollution Prevention Plan Spill Prevention, Control, and Countermeasure Plan State Inspections/Investigations Records NPDES Discharge Monitoring Reports POTW Discharge Monitoring Reports Notice of Violations Oil/Water Separator Cleaning Records Documentation for Monitoring Wells Dike Drainage Log

Subject Area	Controlled ES&OH Documents and Records
Oil Pollution Act of 1990 (OPA-90)	Facility Response Plan Approval Letters Qualified Individual Notification Drills (Quarterly review) Spill Management Team Tabletop Exercises (Annual review) Unannounced Exercises OSRO Equipment Deployment Exercises (Annual review) Facility Owned Equipment Deployment Exercises Spill Cooperative Meeting Minutes, etc.
Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)	Assessment Reports Remediation Reports Monitoring Reports
S&OH management	Hazard Communication Plan (Annual review) Personal Protective Equipment Plan (Annual review) Fire and Safety Prevention Plan (Annual review) Lock-Out/Tag-Out Plan (LO-TO) (Annual review) Confined Space Plan (CSP) (Annual review) Respirator Protection Plan (Annual review) Hazardous Waste Operations and Emergency Response SOP (Annual review) Safety and Health Business Plan (Annual review) Ergonomics Plan (Annual review) Safe Transportation of Hazardous Materials SOP (Annual review) Safety and Occupational Health Training Plan (Annual review) Supervisory Safety SOP (Annual review) Collateral Duty SOP (Annual review) Personal Protective Equipment for QAS SOP (Annual review) QAS Medical Surveillance Program (Annual review) Laboratory Safety/Chemical Hygiene Plan (Annual review) Accident/injury OSHA records

Subject Area	Controlled ES&OH Documents and Records
Laboratory analysis reports	Tank Bottom Water
	Groundwater
	Stormwater
	Purge Water from Groundwater Monitoring Wells
	Surface Water
	Paint Chips
	Sandblasting Waste
	Contaminated Soil
	Sludge
	Spent Solvents from Laboratory Operations
	Cleanup Materials, i.e., pillows, sorbents, socks, etc.
	Filters
Plan reviews by DFSP Personnel	Spill Prevention Control and Countermeasure Plan (SPCC) Review Records (Semi-annual)
	Emergency Action Plan (EAP) Review Records (Annual)
	Facility Response Plan (FRP) Review Records (Quarterly)
	Hazard Communication Plan Review Records (Annual)
	Personal Protective Equipment Plan Review Records (Annual)
	Fire and Safety Prevention Plan Review Records (Annual)
	Lock-Out/Tag-Out Plan (LO-TO) Review Records (Annual)
	Confined Space Plan (CSP) Review Records (Annual)
	Reporting of Accidents/Injuries Procedures Review Records (Annual)
	Safe Transportation of Hazardous Materials Plan Review Record (Annual)
	Hazardous Waste Operations and Emergency Response Plan Review Record (Annual)
	Oil Pollution Prevention Operations Manual (OPPOM) Review Records (Annual)
	Respiratory Protection Plan Review Records (Annual)
	Pest Management Plan Review Records (Annual)
	Stormwater Pollution Prevention Plan Review Records (Annual)

Subject Area	Controlled ES&OH Documents and Records
Training requirements	DESC Training Inventory
	Safety Training Records
	Hazard Communication Training Records
	Confined Space Entry Training Records
	Personal Protective Equipment (Respiratory Protection) Training Records
	Hazardous Waste Operations and Emergency Response (HAZWOPER) Training Records
	Safe Transportation of Hazardous Materials Training Records
	Recordkeeping for Occupational Injuries/Accidents –OSHA 300 (Annual)
	Environmental Protection Training Records
	Facility Spill Coordinator (FSC) and On-Scene Coordinator Training (OSC) Records
	Acting DFSP Fire Chief Training Records
	Facility Response Plan (FRP) Training Records
	Fire Safety and Prevention Plan Records
	OPA-90 Emergency Response Training Records
	Other ES&OH Training Records
Environmental audits and reviews	Records of DESC Audits and Reviews
	Records of DLA Audits
	Records of USACHPPM EMS
Construction permits (create a new file for each new project)	Oil/Water Separator Project Files
	Tank Reconstruction Project Files
	Remediation Project Files

MANAGEMENT PROCEDURE 11

OPERATIONAL CONTROL

1.0 Purpose

This procedure guides DESC personnel in developing, documenting, and training process controls to ensure safe and environmentally sound operation of DESC processes.

2.0 Definitions

Process Control

Procedures, with designated responsibilities and frequencies, implemented to control a process's environmental aspects and S&OH hazards or to prevent or mitigate the impacts of those aspects/hazards. Process control is achieved through effective:

- Training and awareness (see MP-07, Training, Awareness, and Competence)
- Internal communication (see MP-08, Communication)
- Operational control (prescribed operating instructions for a process)
- Emergency preparedness and response (see MP-12, Emergency Preparedness and Response)
- Compliance inspection and sampling and analysis (see MP-13, Performance Monitoring and Measurement), and
- Record control (see MP-15, Records).

Some process controls are required by regulation or policy. Many more are not "required," but are judged by DESC-WE to be necessary to achieve the above purposes or to otherwise minimize risks to mission.

3.0 Procedure

3.1 Discussion

To develop procedures to ensure safe and environmentally sound process operations, ES&OH program managers collaborate with process owners to:

- Identify required and other necessary process controls for DESC processes, considering the process inventory and associated aspects and hazards (see MP-02, Aspects, Hazards, and Risk),
- Identify aspects, hazards, and risks associated with goods, equipment, and services purchased or used by the DFSPs,
- Develop risk assessments and risk controls for all identified hazards,
- Develop relevant process controls, and communicate those controls to DSFP staff and suppliers or subcontractors,
- Develop methods to reduce the severity of aspect and hazard risks,
- Translate requirements into actions that can be understood and implemented, and
- Determine responsibilities and frequencies, as appropriate.

Point-of-use checklists (see MP-13, Performance Monitoring and Measurement) are closely related to the process control procedures and are developed in conjunction with the procedures.

DESC process control procedures are documented in the DFSP O&M manuals. Additional process information is provided in the *Environmental Guide for Fuel Terminals*. The DFSP O&M manuals are periodically reviewed and updated by ES&OH program managers to ensure continued adequacy in supporting the goals of the ES&OH MS. Revisions to process controls are coordinated with DFSP staff (see *MP-08*, *Communication*).

3.2 Responsibilities

Person Responsible	Responsibility
Chief, DESC-WE	 Ensure that process controls are documented in the DFSP O&M manuals. Ensure that the DFSP O&M manuals are periodically reviewed to ensure the continued adequacy of process controls in mitigating risks to mission.
ES&OH program managers, DESC-WE	 With the OARs, coordinate with DFSP personnel to develop and implement process controls. Ensure that process controls are documented in the DFSP O&M manuals. Periodically review the DFSP O&M manuals to ensure the continued adequacy of process controls in mitigating risks to mission. Ensure that DFSP subcontractors performance work statements stipulate adherence to process control procedures.
QARs, DESC-WE	 With the program managers, coordinate with DFSP personnel to develop and implement process controls. Coordinate revisions to process controls and the O&M manuals with DFSP personnel. Ensure that DESC processes and services are operated (by DFSP operating contractors an subcontractors) in accordance with process control procedures stipulated in the DFSP O&M manuals or performance work statements.
DFSP superintendents	 Ensure that DESC processes and services are operated (by DFSP operating contractors an subcontractors) in accordance with process control procedures stipulated in the DFSP O&M manuals or performance work statements. Coordinate with DESC-WE OARs and program managers to develop and implement process controls. Participate, with ES&OH program managers, in developing revisions to process controls and the O&M manuals.
DFSP process owners and subcontractors	Operate processes and services in accordance with process control procedures stipulated in the DFSP O&M manuals or performance work statements.

4.0 Key Documents and Records

- DESC Environmental Guide for Fuel Terminals
- DESC ES&OH MS manual
- DFSP O&M manuals
- MP-08, Communication
- MP-13, Performance Monitoring and Measurement

Documents in **bold** are subject to document control procedures specified in MP-10, Document Control.



5.0 Review Checklist

 □ Are process controls meeting the requirements of this management procedure documented in the DFSP O&M manuals? □ Do the O&M manuals adequately address all processes with risks where control measures need to be applied? □ Do process control procedures stipulate criteria for training and awareness, communication, operational control, emergency preparedness and response, and inspection and sampling/analysis, as appropriate to the nature of each process addressed? □ Are the DFSP O&M manuals periodically reviewed to ensure their continuing adequacy in mitigating risks to mission? □ Are revisions to the process control procedures and O&M manuals coordinated with DFSP personnel? □ Are process control procedures developed for new or modified processes to eliminate or reduce ES&OH risks at their source? □ Do DFSP personnel communicate, and do subcontractors' performance work statements stipulate, required operational control procedures? □ Do process owners and DFSP subcontractors operate in accordance with process control procedures documented in the O&M manuals? 	
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MANAGEMENT PROCEDURE 12

EMERGENCY PREPAREDNESS AND RESPONSE

1.0 Purpose

This procedure incorporates DESC-WE emergency preparedness and response programs (which define procedures for the planning, prevention, response, and communication of oil and hazardous substance releases) into the ES&OH MS.

2.0 Definitions

None.

3.0 Procedure

3.1 Discussion

DESC is subject to numerous Federal, state, and local laws and regulations that govern the release of hazardous substances to the environment, many of which specify emergency planning and response requirements. Emergency preparedness and response procedures are designed to prevent, mitigate, and control the impacts of oil and toxic chemicals releases to the environment and to personnel.

MP-11, Operational Control specifies that emergency preparedness and response information be provided to process owners and subcontractors as part of process control procedures documented in the DFSP O&M manuals. Procedures for emergency preparedness and response are applicable, however, at all levels of DFSP operations.

Chapters 1 and 2 of the *Environmental Guide for Fuel Terminals* address general emergency preparedness and response requirements at the DFSPs. Additionally, DESC has developed DFSP-specific Spill Prevention Control and Countermeasure (SPCC) Plans, Emergency Action Plans (EAP), and Facility Response Plans (FRP) for its DFSPs. These plans ensure that DESC response management teams are adequately prepared to address a discharge of oil or hazardous substances through documented procedures for mobilizing personnel and mitigation assets to minimize life threatening situations and damage to natural resources.

The SPCCs, EAPs, and FRPs address emergency preparedness and response procedures for existing processes operated on the DFSPs. The emergency preparedness and response plans require periodic testing of emergency response procedures. DFSPs conduct up to 12 emergency preparedness and response exercises each year, ranging from telephone recall testing to worst-case discharge scenario exercises. The SPCCs and FRPs require DESC personnel to assess the adequacy of preparedness and response procedures as new processes are initiated.

DFSP QARs and superintendents are primarily responsible for ensuring the DFSP operations are conducted in accordance with applicable emergency preparedness and response procedures. The ES&OH program managers annually review the SPCCs, EAPs, and FRPs. The plans are revised, as appropriate, to ensure continued adequacy in emergency preparedness and response. Additionally, the plans are reviewed and revised, as appropriate, following the occurrence of an incident, accident, or emergency situation.

3.2 Responsibilities

Person Responsible	Responsibility
Chief, DESC-WE	 Coordinate with ES&OH program managers to ensure that adequate (annual) emergency preparedness and response exercises are conducted at all DFSPs
ES&OH program managers, DESC-WE	 Comply with responsibilities described in the SPCCs, EAPs, and FRPs at DFSPs for which they are responsible.
	 Follow up on emergency incidents with QARs, and superintendents to determine causes and implement corrective and preventive actions per MP-14, Corrective and Preventive Action.
	 Distribute information from emergency preparedness and response plans to the appropriate process owners.
	 Work with superintendents and QARs to develop emergency preparedness and response measures for new and modified processes.
	 Annually, or after any incident, review and revise emergency preparedness and response plans.
	 Plan, participate in, and document emergency response exercises at each DFSP in accordance with emergency preparedness and response plans.
QARs, DESC-WE	 With the superintendents, ensure DFSP operations are conducted in accordance with applicable emergency preparedness and response procedures.
	 Support program managers in developing emergency preparedness and response measures for new and modified processes.
	 Follow up on emergency incidents with program managers, and superintendents to determine causes and implement corrective and preventive actions per MP-14, Corrective and Preventive Action.
	 Support the program managers in reviewing/revising emergency preparedness and response plans annually or after any incident.
	 Plan, participate in, and document emergency response exercises at each DFSP in accordance with emergency preparedness and response plans.
DFSP superintendents	 With the OARs, ensure DFSP operations are conducted in accordance with applicable emergency preparedness and response procedures.
	 Support program managers in developing emergency preparedness and response measures for new and modified processes.
	 Follow up on emergency incidents with OARs and program managers to determine causes and implement corrective and preventive actions per MP- 14, Corrective and Preventive Action.
	 Support the program managers in reviewing/revising emergency preparedness and response plans annually or after any incident.
	Plan, participate in, and document emergency response exercises at each DFSP in accordance with emergency preparedness and response plans.

Person Responsible	Responsibility
DFSP process owners and subcontractors	 Incorporate emergency preparedness and response procedures relevant to their jobs into day-to-day operations.
	 Notify ES&OH program managers of new or modified processes and determine jointly what response measures are needed.
	 Participate in emergency response exercises in accordance with emergency preparedness and response plans.

4.0 Key Documents and Records

- DFSP SPCCs, EAPs, and FRPs
- DESC Environmental Guide for Fuel Terminals
- Records of emergency preparedness and response exercises
- Accident/Incident OSHA Records
- MP-11, Operational Control
- MP-14, Corrective and Preventive Action

Documents in **bold** are subject to document control procedures specified in MP-10, Document Control.



5.0 Review Checklist

- Do DESC's emergency preparedness and response plans identify the potential for incidents and emergency situations?
- Do DESC's emergency preparedness and response plans include procedures for response to incidents and emergency situations to effectively mitigate associated ES&OH impacts?
- ☐ Are emergency response procedures tested periodically?
- Are emergency preparedness and response plans reviewed and revised on an annual basis or after the occurrence of any accident or incident?
- Do DESC personnel revise emergency preparedness and response plans when new or modified processes are identified at the DFSPs?

MANAGEMENT PROCEDURE 13

PERFORMANCE MEASUREMENT AND MONITORING

1.0 Purpose

This procedure guides DESC personnel in evaluating the effectiveness of the ES&OH MS through ongoing monitoring and measurement of compliance with ES&OH requirements, conformance with ES&OH requirements and operational controls, and progress in meeting ES&OH objectives and targets.

2.0 Definitions

Compliance Adherence to Federal, state, local, DOD, DLA, regional and other applicable legal,

regulatory, or policy requirements.

Conformance Adherence to DESC ES&OH MS criteria, as documented in Table 3-1 of the

ES&OH MS manual.

3.0 Procedure

3.1 Discussion

DESC continually evaluates ES&OH performance by monitoring or measuring the following:

- Compliance with applicable environmental legislation, regulations, permits, and policy requirements (see *MP-03*, *Legal and Other Requirements*)
- Conformance with ES&OH MS requirements (see MP-16, ES&OH MS Audit), including effective implementation of process control procedures (see MP-11, Operational Controls), and
- Status in meeting ES&OH objectives and targets (see MP-04, Objectives and Targets).

DESC ES&OH MS criteria for this element also require procedures to check and calibrate monitoring equipment.

Information developed within the monitoring and measurement element is essential input for other ES&OH MS elements:

- Problems and opportunities for improvement identified through monitoring and measurement are subject to procedures for the development of corrective or preventive actions (see *MP-14*, *Corrective and Preventive Action*).
- Performance monitoring results often suggest shortcomings in the ES&OH MS and should thus be considered during the ES&OH MS audit (see MP-16, ES&OH MS Audit).
- As an indicator of overall ES&OH performance, monitoring and measurement results are also useful in supporting senior management's review of the ES&OH MS (see MP-17, Management Review).

Compliance

DESC-WE ES&OH program managers measure compliance with regulatory and policy requirements through annual, documented inspections at the DFSPs, using ES&OH compliance checklists contained in Appendix D to the DESC *Environmental Guide for Fuel Terminals*. An external perspective is provided every third year at each DFSP through contractor-provided inspections. The scope and detail of compliance inspections is tailored to annual performance at each DFSP, including the most recent analysis of risk and determination of significant processes, aspects, and/or hazards (see *MP-02*, *Aspects*, *Hazards*, *and Risks*).

The results of S&OH inspections, including corrective action plans and results, are documented in a database maintained by the DESC-WE S&OH program manager.

DFSP personnel conduct and document regular inspections of processes, as required by regulation, using point-of use checklists documented in the DFSP O&M manuals.

DFSPs are also subject to compliance inspections by external regulatory authorities. DESC ES&OH program managers are responsible for coordinating regulator visits to DESC facilities (see *MP-08*, *Communication*). Unfavorable findings from regulatory inspections may result in required corrective and preventive actions taken by the DFSPs. Development of solutions in response to regulatory findings follow the same procedures applied for internal findings (see *MP-14*, *Corrective and Preventive Action*).

Conformance

DESC-WE ES&OH program managers review the effectiveness of ES&OH MS implementation in accordance with the ES&OH MS criteria. To review the ES&OH MS, DESC-WE program managers apply the review checklists documented in each of these management procedures, during annual compliance inspections (see *MP-16*, *ES&OH MS Audit*). During the annual ES&OH MS review and through ongoing communication with DFSP staff, DESC-WE personnel also monitor:

- The effectiveness of the operational criteria documented in the DFSP O&M manuals (see *MP-11*, *Operational Control*) and
- The effectiveness of management programs established to meet ES&OH objectives and targets (see MP-05, ES&OH Management Programs).

Operational criteria or management programs found to be ineffective in meeting their goals are revised accordingly.

ES&OH Objectives and Targets

DESC's ES&OH objectives and targets establish proactive performance measures. Status of meeting the objectives and targets is the primary measure of ES&OH MS effectiveness. DESC-WE program managers measure performance through a semi-annual review of progress in meeting objectives and targets (see MP-04, Objectives and Targets. Objectives and targets are revised as appropriate to promote continual performance improvement.

Calibration of Monitoring Equipment

Monitoring and safety equipment operated by DFSP contractors is maintained and calibrated in accordance with the manufacturers' criteria and national standards. DFSP personnel are responsible for calibrating and maintaining all monitoring and safety equipment and for maintaining associated records.

3.2 Responsibilities

Person Responsible	Responsibility
Chief, DESC-WE	Remain informed on the status of meeting ES&OH objectives and targets.
ES&OH program managers, DESC-WE	 Conduct semi-annual reviews of the status of meeting ES&OH objectives and targets, and brief the Chief, DESC-WE on the results. Conduct annual compliance inspections at DFSPs for which they are responsible, and brief the superintendents on the results. Ensure that compliance checklists and point-of-use checklists remain current. Coordinate and oversee tri-annual external compliance inspections conducted by contractor. Conduct annual ES&OH MS reviews during compliance inspections. Ensure that ES&OH MS review checklists provided in these management procedures remain current.
DFSP superintendents	 Ensure that periodic compliance inspections required by regulations are conducted using point-of-use checklists, and that the results of these inspections are documented. Remain aware of current compliance status at their DFSPs, as briefed by DESC-WE ES&OH program managers and DFSP staff. Ensure that DFSP personnel conduct proper calibration and maintenance of monitoring and safety equipment.
DFSP process owners and subcontractors	 Conduct periodic compliance inspections as required by regulations, using point-of use checklists documented in the DFSP O&M manuals. Ensure that the DFSP superintendent and DESC-WE ES&OH program managers remain apprised of the results of local inspections. Conduct proper calibration and maintenance of all monitoring and safety equipment in accordance with the manufacturers' specifications and national standards. Maintain calibration and maintenance records.

4.0 Key Documents and Records

- Local compliance inspection records
- DESC-WE compliance inspections and EMS review records
- Monitoring equipment calibration and maintenance records
- DFSP O&M manuals and point-of-use checklists
- DESC Environmental Guide for Fuel Terminal and compliance checklists
- MP-02, Aspects, Hazards, and Risks
- MP-03, Legal and Other Requirements
- MP-04, Objectives and Targets
- MP-05, ES&OH Management Programs
- MP-08, Communication
- MP-11, Operational Control
- MP-14, Corrective and Preventive Action
- MP-16, ES&OH MS Audit
- MP-17, Management Review

Documents in **bold** are subject to document control procedures specified in MP-10, Document Control.

5.0 **Review Checklist** Has DESC established proactive performance measures? Do DESC personnel periodically evaluate the status of meeting ES&OH objectives and targets? Do DESC personnel periodically evaluate compliance with applicable ES&OH requirements? Do DESC personnel periodically evaluate conformance with ES&OH MS requirements, including ES&OH management programs and operating criteria? Do DESC personnel ensure that monitoring and safety equipment is calibrated and maintained in accordance with manufacturers' specifications and national standards, and that the results of this calibration and maintenance are documented? Do DESC ES&OH program managers maintain compliance checklists and point-of-use checklists, ensuring they remain current with changing requirements and DFSP operations? Do the Chief-DESC-WE and DFSP superintendents remain aware of the results of performance measuring and monitoring initiatives?



MANAGEMENT PROCEDURE 14

CORRECTIVE AND PREVENTIVE ACTION

1.0 Purpose

This procedure guides DESC personnel in investigating and correcting identified compliance and conformance problems.

2.0 Definitions

Problem Generally, a deviation from expected results.

Compliance Adherence to Federal, state, local, DOD, DLA, regional and other applicable legal,

regulatory, or policy requirements.

Conformance Adherence to DESC ES&OH MS criteria, as documented in Table 3-1 of the

ES&OH MS manual.

Problem Solving Application of a structured approach to identify problems and their root causes and

to develop and implement cost-effective, permanent solutions.

3.0 Procedure

3.1 Discussion

Compliance and conformance problems are identified through a variety of ES&OH MS processes:

- Performance monitoring and measurement procedures (see MP-13, Performance Monitoring and Measurement) stipulate periodic review of DESC's compliance with requirements, conformance with DESC's ES&OH MS, and status in meeting ES&OH objectives and targets.
- The ES&OH audit and reviews (see MP-15, ES&OH MS Audit) identify shortcomings in ES&OH MS conformance.
- The occurrence of environmental impacts, accidents, and S&OH incidents can cause compliance problems or suggest significant problems within the ES&OH MS.
- Hazard Reports (DLA Form 1401) received from DFSP personnel or DESC staff report hazards in the workplace.

DESC's commitment to continual performance improvement implies a commitment to investigating and correcting identified problems. While solutions to some problems are simple and immediately implemented, DESC-WE personnel investigate, identify causes, and develop solutions for any widespread or recurring nonconformance or noncompliance, or where other "fixes" have failed in the past.

To investigate problems and develop solutions, DESC-WE program managers apply and document the following "problem-solving" process:

- Define the problem and describe the desired end-state.
- Identify and analyze contributing and root causes.
- Develop alternative corrective/preventive actions.
- Select/develop/implement corrective or preventive actions.
- Monitor results of implemented solutions to ensure that they achieve the desired result), and prevent future occurrences.

Problem solving often involves coordination with DFSP personnel who are most familiar with the processes involved. Typical lines of inquiry for problem investigation and solutions development include the following:

- Is there a procedure in place relevant to the observed problem(s)?
- Is the procedure adequate to meet requirements or expectations? Are documented roles, responsibilities, and frequencies in the procedure adequate?
- Is the procedure followed?
- Do variables external to the process under consideration contribute to the problem?
- Are there factors outside the control of DFSP personnel or the ES&OH program managers contributing to the problem? Do other parties need to be consulted in determining causes or developing solutions?

Problem solving investigations in response to S&OH problems may also pursue additional lines of inquiry:

- Are pertinent policies and procedures sufficient to ensure all accidents are investigated?
- Do pertinent policies and procedures require all accidents and incidents to be reported?
- Do pertinent policies and procedures ensure that no employee suffers any hardship as a result of reporting a non-conformance?
- Has the corrective action been initiated?

DESC-WE ES&OH program managers develop corrective and preventive actions using the process for developing ES&OH management programs prescribed in MP-05, ES&OH Management Programs. Corrective and preventive actions are documented and define responsibilities and authorities for implementing and monitoring the effectiveness of solutions. The risk analysis procedure prescribed in MP-02, Aspects, Hazards, and Risks is applied to any suggested solutions prior to their implementation.

The results of S&OH inspections, including corrective action plans, are submitted to DESC-WE in a report format and are maintained by the DESC-WE S&OH program manager.

Development of corrective and preventive actions is coordinated with affected DFSP personnel, as appropriate. Solutions may also require senior management approval, coordination with other DESC divisions or offices, or external funding. The results of problem solving are forwarded to the EMS team, as appropriate, to support management review of the ES&OH MS (see MP-17, Management Review).

3.2 Responsibilities

Person Responsible	Responsibility
Chief, DESC-WE	 Coordinate investigations and development of corrective and preventive actions with ES&OH program managers and the ES&OH MS team.
ES&OH MS team	 Review and approve, as appropriate, corrective and preventive actions recommended by DESC-WE.
ES&OH program managers, DESC-WE	 Investigate identified compliance or conformance problems to identify causes and develop appropriate corrective or preventive actions.
	 Investigate occurrences of environmental impacts, accidents, or S&OH incidents to identify causes and develop appropriate corrective or preventive actions.
	 Coordinate investigations and development of corrective and preventive actions with the Chief, DESC-WE.
	 Coordinate investigations and development of corrective and preventive actions with DFSP staff.
	Document the process and results of all problem solving initiatives.
QARs, DESC-WE	 Participate with ES&OH program managers on investigating problems and developing corrective and preventive actions.
DFSP superintendents	 Participate with ES&OH program managers on investigating problems and developing corrective and preventive actions.
DFSP process owners and subcontractors	 Participate with ES&OH program managers on investigating problems and developing corrective and preventive actions.

4.0 Key Documents and Records

- Records documenting the problem solving process and developed solutions
- MP-05, ES&OH Management Programs
- MP-13, Performance Monitoring and Measurement
- MP-15, ES&OH MS Audit
- MP-17, Management Review

Documents in **bold** are subject to document control procedures specified in MP-10, Document Control.



5.0 Review Checklist

Has DESC assigned responsibility and authority for investigating environmental impacts, accidents, or incidents of noncompliance or nonconformance?
Do DESC personnel apply a problem solving process to investigate, define causes, and develop solutions (corrective and preventive actions) after environmental impacts, accidents, or incidents?
Is the problem solving process documented?
Is the risk analysis procedure defined in MP-02, Aspects, Hazards, and Risks applied to corrective and preventive actions prior to their implementation?
Are investigations and development of corrective and preventive actions coordinated with the ES&OH MS team and Senior DESC managers, as appropriate?
Do DFSP personnel participate, as appropriate, in investigations and the development of corrective and preventive actions?
Are corrective and preventive actions monitored over time to ensure they meet performance expectations?

MANAGEMENT PROCEDURE 15

RECORDS

1.0 Purpose

This procedure guides DESC personnel in managing ES&OH records.

2.0 Definitions

ES&OH Records

ES&OH records furnish objective evidence of activities performed or results achieved. Records are statements of fact for a given point in time. They address historical activity and must be maintained for a specified or indefinite period of time; their contents are not subject to change. Examples of ES&OH records include training records; manifests or bills of lading; communication records; required reports; compliance inspection results; minutes of ES&OH MS team meetings; etc.

3.0 Procedure

3.1 Discussion

Effective management of ES&OH records is essential to demonstrate regulatory compliance and ES&OH MS conformance. Management of ES&OH records includes:

- Identifying records to be managed,
- Identifying regulatory and policy requirements for recordkeeping and retention (see MP-03, Legal and Other Requirements),
- Ensuring availability of records to appropriate DESC personnel,
- Ensuring records are stored at appropriate locations,
- Ensuring compliance with requirements for records maintenance and retention, and
- Ensuring appropriate disposal or archiving for records exceeding required retention times.

ES&OH regulations, permits, and policy require that certain ES&OH records be developed and maintained. Record-keeping requirements specify required locations and time frames for record retention.

Examples of required records include (but are not limited to):

- Records relating to toxics release inventory (TRI) calculations and reporting,
- Records relating to employee ES&OH training (see MP-07, Training, Awareness and Competence),
- Records relating to hazardous and solid waste disposal,
- Records related to compliance inspections (see MP-13, Performance Monitoring and Measurement),
- Records relating to accident/incident investigations and follow-up reports, and
- Records related to corrective/preventive actions.

Other, non regulatory-required environmental and safety records are also maintained to meet ES&OH MS criteria. Examples include (but are not limited to):

- Records of communication (see MP-08, Communication);
- Problem solving documentation (see MP-14, Corrective and Preventive Action); and
- Records related to ES&OH MS review and improvement (see MP-16, ES&OH MS Audit and MP-17, Management Review).

The DESC File Management Plan (see Enclosure A of MP-10, Document Control) specifies ES&OH records to be maintained within the DESC ES&OH MS, with required review/revision cycles.

ES&OH records maintained by DESC personnel are required to be:

- Legible, identifiable, and traceable to their point of origin,
- Maintained in accordance with the File Management Plan and relevant regulatory and policy requirements, and
- Stored and maintained to be retrievable and protected from loss or damage.

DESC-WE's ES&OH MS management representative is responsible for maintaining the File Management Plan. DESC-WE personnel and DFSP staff are responsible for maintaining ES&OH records pertinent to their jobs in accordance with the File Management Plan. ES&OH program managers review ES&OH records maintenance at the DFSPs during compliance inspections and ES&OH MS reviews (see *MP-13*, *Performance Measurement and Monitoring*).

3.2 Responsibilities

Person Responsible	Responsibility
Chief, DESC-WE	 Ensure DESC-WE personnel maintain ES&OH records in accordance with the DESC File Management Plan.
ES&OH MS management representative	 Maintain a current inventory of ES&OH records controlled under the ES&OH MS.
ES&OH program managers, DESC-WE	 Maintain DESC-WE records pertinent to their jobs in accordance with regulations and the DESC File Management Plan. Review ES&OH records maintenance at the DFSPs during compliance inspections and ES&OH MS reviews.
QARs, DESC-WE	 Maintain DFSP records pertinent to their jobs in accordance with regulations and the DESC File Management Plan. Ensure DFSP personnel maintain ES&OH records in accordance with regulations and the DESC File Management Plan.
DFSP superintendents	Ensure DFSP personnel maintain ES&OH records in accordance with regulations and the DESC File Management Plan.
DFSP process owners and subcontractors	 Maintain ES&OH records pertinent to their jobs in accordance with regulations and the DESC File Management Plan.

4.0 Key Documents and Records

- DESC File Management Plan
- MP-03, Legal and Other Requirements
- MP-07, Training, Awareness and Competence
- MP-08, Communication
- MP-10, Document Control
- MP-13, Performance Measurement and Monitoring
- MP-14, Corrective and Preventive Action
- MP-16, ES&OH MS Audit
- MP-17, Management Review

Documents in **bold** are subject to document control procedures specified in MP-10, Document Control.



5.0 Review Checklist

- Do DESC-WE and DFSP personnel maintain ES&OH records in accordance with requirements and the DESC File Management Plan?
- Does the ES&OH MS management representative maintain the records inventory contained in the File Management Plan?
- ☐ Do ES&OH MS program managers review ES&OH records during DFSP compliance inspections and ES&OH MS reviews?
- Are records maintained in accordance with required retention times?
- Are records legible, identifiable, and traceable to their point of origin?
- Are records stored and maintained to be retrievable and protected against loss or damage?

MANAGEMENT PROCEDURE 16

ES&OH MS AUDIT

1.0 Purpose

This procedure guides DESC personnel in determining if the ES&OH MS conforms to DESC ES&OH MS criteria, is effectively implemented and maintained, and is effectively meeting ES&OH Policy goals and objectives and targets.

2.0 Definitions

Conformance Adherence to DESC ES&OH MS criteria, as documented in Table 3-1 of the

ES&OH MS manual.

ES&OH MS Criteria A set of detailed criteria clearly defining requirements for each of the seventeen

ES&OH MS elements. The ES&OH MS criteria support comprehensive ES&OH MS planning and implementation and are auditable to support the ES&OH MS audit and management review. Table 3-1 of the ES&OH MS manual presents the

ES&OH MS criteria. The DESC ES&OH MS criteria are derived from

requirements prescribed in ISO14001 and OHSAS 18001.

ES&OH MS Audit An external, periodic review of the ES&OH MS, conducted by personnel independent

of DESC's organization, to determine conformance with ES&OH MS criteria, effectiveness of implementation and maintenance of the ES&OH MS elements, and

status in meeting ES&OH objectives and targets.

ES&OH MS Review An internal, periodic review of the ES&OH MS, conducted by DESC-WE

personnel, to determine conformance with ES&OH MS criteria, effectiveness of implementation and maintenance of the ES&OH MS elements, and status in

meeting ES&OH objectives and targets.

3.0 Procedure

3.1 Discussion

DESC's ES&OH MS is subjected to both internal reviews and external audits:

- DESC-WE ES&OH program managers conduct an internal review of the ES&OH MS during annual compliance inspections, using the review checklists provided in these management procedures.
- DLA has arranged for the United States Army Center for Health Promotion and Preventive Medicine (USACHPPM) to provide an external ES&OH MS audit during triennial environmental program reviews at each of its organizations, including DESC.

Review and audit of the ES&OH MS is an essential element in ensuring continual improvement in ES&OH performance. The ES&OH MS review/audit is closely related to DESC's performance measurement initiatives (MP-13, Performance Measurement and Monitoring).

Review/audit of the ES&OH MS determines if DESC's ES&OH MS:

- Adequately addresses DESC's ES&OH MS criteria (which are derived from ISO 14001 and OHSAS 18001);
- Is effectively implemented and maintained; and
- Is effectively meeting the goals of DESC's ES&OH Policy and ES&OH objectives and targets.

The results of both reviews and audits are provided to the ES&OH MS team and DESC senior management for coordination. Some findings may be subject to the development of corrective and preventive actions prescribed in MP-14, Corrective and Preventive Action. All results are documented and maintained to support further performance improvements and future audits/reviews.

Internal ES&OH MS Review

DESC-WE ES&OH program managers review ES&OH MS effectiveness in conjunction with annual compliance inspection site visits to each DFSP. The ES&OH MS management representative annually reviews ES&OH MS effectiveness at DESC-WE. To conduct the review, program managers or the management representative assess implementation of ES&OH MS elements using the review checklists provided in these management procedures through interviews with DFSP or DESC-WE personnel, document reviews, and site walk-throughs.

The scope and detail of each annual review is planned based on the identified risks, results of previous reviews, external (USACHPPM) audits, current monitoring and measurement efforts, or other ES&OH performance information. The results of the internal ES&OH MS review are documented.

External ES&OH MS Review

USACHPM conducts a triennial audit, on behalf of DLA, of DESC's ES&OH MS, assessing strengths and weaknesses of the ES&OH MS at DESC-WE and the DFSPs. In particular, the USACHPPM's audit scope addresses the following: organizational structure; staff resources, training, and development; program evaluation, reporting and corrective action; communication; and policies, programs, procedures, and recordkeeping.

USACHPPM's audit scope focuses primarily on environmental management, and is fully defined in the document, *DLA Environmental Program Reviews*. DESC-WE and DFSP personnel support USACHPPM auditors, providing ES&OH MS documentation, accommodating staff interviews, and facilitating site visits and walk-throughs. The results of USACHPPM's audits are provided to DLA and the Chief, DESC-WE.

3.2 Responsibilities

Person Responsible	Responsibility
ES&OH MS team and DESC senior management	 Remain aware of the results of ES&OH MS reviews and audits, as communicated by the Chief, DESC-WE.
Chief, DESC-WE	 Review the results of all internal ES&OH MS reviews and external ES&OH MS audits provided by the ES&OH MS management representative. Provide the results of internal EMS reviews and external ES&OH MS audits to the EMS team to support the management review. Provide the results of ES&OH MS external audits to DLA.
ES&OH MS management representative	 Coordinate ES&OH MS reviews across the DFSPs to ensure consistency. Annually, conduct a review of the ES&OH MS as implemented at DESC-WE, thoroughly documenting the results. Compile the results of internal ES&OH MS reviews across all DFSPs and provide the results to the Chief, DESC-WE. Support USACHPPM personnel in conducting the ES&OH MS audit, by providing information, and documentation and coordinating site visits to the DFSPs. Ensure that findings of ES&OH MS reviews and audits are submitted for development of corrective and preventive actions. Ensure that the ES&OH MS review checklists provided with each management procedure remain current.
ES&OH program managers, DESC-WE	 Conduct an internal review of the ES&OH MS during annual compliance inspections at the DFSPs, using the review checklists provided in these management procedures. Ensure ES&OH MS review results are thoroughly documented. Provide the results of internal ES&OH MS reviews to DESC ES&OH MS management representative.
QARs. DESC-WE	 Accommodate DESC-WE program managers and USACHPPM staff during ES&OH MS reviews and audits, providing information, and documentation and coordinating staff time.
DFSP superintendents	 Accommodate DESC-WE program managers and USACHPPM staff during ES&OH MS reviews and audits, providing information, and documentation and coordinating staff time.
DFSP process owners and subcontractors	 Accommodate DESC-WE program managers and USACHPPM staff during ES&OH MS reviews and audits, providing information, and documentation and site walk-throughs.

4.0 Key Documents and Records

- ES&OH MS manual and ES&OH MS criteria
- ES&OH MS audit and review records
- MP-13, Performance Measurement and Monitoring
- MP-14, Corrective and Preventive Actions

Documents in **bold** are subject to document control procedures specified in MP-10, Document Control.

5.0 **Review Checklist** Do DESC ES&OH program managers conduct annual internal reviews of the ES&OH MS at each of the DFSPs? Does the ES&OH MS management representative annually review ES&OH MS implementation at DESC-WE? Do the internal ES&OH MS reviews determine if DESC's ES&OH MS conforms with the ES&OH MS criteria derived from ISO 14001 and OHSAS 18001? Is DESC's internal ES&OH MS effectively implemented and maintained? Is DESC's internal ES&OH MS effectively meeting ES&OH Policy goals and ES&OH objectives and targets? Does DESC accommodate external ES&OH MS audits? Do the external ES&OH MS audits determine if DESC's ES&OH MS conforms with the ES&OH MS criteria derived from ISO 14001 and OHSAS 18001? Is DESC's external ES&OH MS effectively implemented and maintained? Is DESC's external ES&OH MS effectively meeting ES&OH Policy goals and ES&OH objectives and targets? Do ES&OH MS reviews and audits assess the results of previous audits? Are ES&OH MS review and audit scopes based on the results of previous audits and results of the risk analysis? Are the results of ES&OH MS reviews and audits provided to the Chief, DESC-WE and the ES&OH MS team for review?



MANAGEMENT PROCEDURE 17

MANAGEMENT REVIEW

1.0 Purpose

This procedure guides the DESC ES&OH MS team in conducting an annual management review of DESC's ES&OH MS and in implementing appropriate improvements recommended by DESC-WE.

2.0 Definitions

None.

3.0 Procedure

3.1 Discussion

DESC's annual ES&OH MS management review supports its commitment to continual improvements in ES&OH performance. ES&OH performance is indicated by progress in meeting ES&OH objectives and targets (see MP-04, Objectives and Targets) and in complying with environmental requirements (see MP-03, Legal and Other Requirements, MP-13, Performance Measurement and Monitoring, and MP-14, Corrective and Preventive Action).

The management representative compiles information of ES&OH MS performance, including:

To conduct the annual review, the ES&OH MS management representative compiles and the ES&OH MS team assesses, at a minimum:

- Results and recommendations of internal ES&OH MS reviews and external audits (see MP-16, ES&OH MS Audit).
- DESC's progress in meeting ES&OH objectives and targets (see MP-04, Objectives and Targets and MP-13, Performance Measurement and Monitoring);
- Results of compliance inspections and related problem solving for identified deficiencies (see MP-13, Performance Measurement and Monitoring and MP-14, Corrective and Preventive Action);
- Results of regulatory inspections (see *MP-13*, *Performance Measurement and Monitoring*) conducted in the preceding year;
- Corrective and preventive actions implemented to resolve compliance deficiencies (see *MP-14*, *Corrective and Preventive Action*);
- Progress in responding to previous management reviews,
- Any other sources of information regarding environmental performance; and
- Recommendations for improvement.

Based on their assessment of all performance-related information, including corrective/ preventive actions, the management representative prepares a progress report for DESC senior management. Some corrective actions developed under MP-14, Corrective and Preventive Action, may require coordination and approval by senior management. For example, ES&OH MS improvements that impact multiple organizational functions may require coordination with the appropriate functional managers. Significant ES&OH MS enhancements requiring modifications to the DFSP operating contractor's performance work statement are referred to DESC-FP.

The ES&OH MS management representative ensures that:

- Corrective/preventive actions approved by senior management are implemented,
- ES&OH MS improvements are reflected in revisions to environmental documents such as the ES&OH MS manual, the DFSP O&M manuals, or these management procedures, and
- The deliberations and decisions of the ES&OH MS team are recorded in meeting minutes or records of decision.

3.2 Responsibilities

Person Responsible	Responsibility
DESC senior management	 Receive results of the management review from the ES&OH MS management representative. Approve implementation of and recommended improvements requiring senior management coordination.
Chief, DESC-WE	 Coordinate with the ES&OH MS management representative to develop the management review for briefing to DESC senior management. Coordinate with DESC-FP, as appropriate, for approved ES&OH MS enhancements requiring modification to the DFSP operating contractor's performance work statement.
ES&OH MS management representative	 Compile all information necessary (including performance results and recommended improvements) to support the management review. Coordinate with the Chief, DESC-WE, present the results of the ES&OH MS review to DESC senior management. Ensure the deliberations of DESC senior management are documented. With the Chief, DESC FQ, coordinate implementation of ES&OH MS enhancements approved by the DESC senior management. Ensure that ES&OH MS improvements are reflected in revisions to environmental documents such as the ES&OH MS manual, the DFSP O&M manuals, or these management procedures.

ES&OH program managers, DESC-WE	 Support the Chief, DESC-WE and the ES&OH MS management representative in implementing approved ES&OH MS enhancements.
QARs, DESC-WE	 Support the Chief, DESC-WE and the ES&OH MS management representative in implementing approved ES&OH MS enhancements.
DFSP superintendents	 Support the Chief, DESC-WE and the ES&OH MS management representative in implementing approved ES&OH MS enhancements.
DFSP process owners and subcontractors	 Support the superintendent in implementing approved ES&OH MS enhancements.

4.0 Key Documents and Records

- Management review records
- MP-03, Legal and Other Requirements
- MP-04, Objectives and Targets
- MP-13, Performance Measurement and Monitoring
- MP-14, Corrective and Preventive Action

Documents in **bold** are subject to document control procedures specified in MP-10, Document Control.



5.0 Review Checklist

- Does the DESC-ES&OH MS management representative annually review the ES&OH MS to ensure continuing suitability, adequacy, and effectiveness in meeting DESC ES&OH goals?
- Are the results of the management review briefed to DESC senior management?
- Are enhancements to the ES&OH Policy, objectives and targets, or other ES&OH MS documentation implemented in response to management review findings?
- ☐ Is the annual ES&OH MS management review documented?

ATTACHMENT E DESC ES&OH TRAINING PLAN

This appendix presents a summary of ES&OH training required for DESC personnel at both Headquarters and DFSP levels. This summary is derived from DLA Instruction 4715.10, *DLA Environmental Hazardous Material/Hazardous Waste Training Plan*, available online at http://www.dtc.dla.mil/env. Chapter 9 of the *Environmental Guide for Fuel Terminals* also offers an overview of required training and providers for training courses.

DESC- ES&OH Required Training Summary

Who Needs Training?	Skill Code	Required Courses
DLA Commanders, deputies, lawyers, senior level managers, and directors whose programs impact the environmental program	E01I	Implied Training: R/703—Executive Environmental
DESC Environmental Protection Specialist	E28	Initial Training: R/501—Hazard Communication R/505—Emergency Response (Specialist) R/533—Oil Pollution Refresher/Recurrent Training: R/605—Annual Emergency Response (Specialist) Refresher R/633—Oil Pollution
	E281	Implied Training: R/704—Introduction to Basic Environmental Protection R/708—Hazardous Waste Management (also known as Resource Conservation and Recovery Act (RCRA)) R/729—Emergency Planning and Community Right-to-Know Act (EPCRA) R/730—Pollution Prevention Act R/732—Environmental Considerations in the Management of DOD Contracts R/734—Inland Spill Control R/735—Geotech Drilling and Sampling R/736—Sampling and Monitoring R/737—Soil Remediation

Who Needs Training?	Skill Code	Required Courses
Environmental officers/specialists/ engineers and those who perform environmental duties and are not physically involved with HM/HW but are responsible for determining and/or implementing policy and/or providing technical guidance.	E02I	Implied Training: R/704—Introduction to Basic Environmental Protection R/706—National Environmental Policy Act (NEPA) R/750—Buying Green: A Multifunctional Approach to Pollution Prevention Depending upon assigned duties, additional training will be customized to ensure training compliance.
Environmental officers/specialists/ engineers and those who perform environmental duties who are physically involved with HM/HW (including occasional contact) and affect transportation, but do not work in an EPA TSD facility.	E03I	Initial Training: R/501—Hazard Communication R/507—Hazardous Waste Operations and Emergency Response (HAZWOPER) R/508—RCRA for Generators of HW R/510—Transportation of HM/HW for DOD Refresher/Recurrent Training: R/603—Annual First Responder Operations Level Refresher R/608—Annual RCRA for Generators of HW Refresher R/610—Biennial Transportation of HM/HW for DOD Recurrent Implied Training: R/706—National Environmental Policy Act (NEPA) R/750—Buying Green: A Multifunctional Approach to Pollution Prevention Depending upon assigned duties, additional training will be customized to ensure training compliance.
Receiving (Employees, including supervisors, involved in the handling and/or management of HMs receiving operations. This includes, but is not limited to: Planners, Material Handlers, and Inspectors.)	E06	Initial Training: R/501—Hazard Communication R/502—First Responder Awareness Level R/511—Storage and Handling of Hazardous Material Refresher/Recurrent Training: R/602—Annual First Responder Awareness Level Refresher R/611—Triennial Storage and Handling of Hazardous Material Recurrent

Who Needs Training?	Skill Code	Required Courses
Employees required to wear respirators to protect against atmospheric contamination. This decision will be made at the facility safety office by evaluating the occupational health hazards associated with the employee duties. (29 CFR 1910.134)	E25	Initial Training: R/501—Hazard Communication R/502—First Responder Awareness Level R/519—Respirator Training Refresher/Recurrent Training: R/602—Annual First Responder Awareness Level Refresher R/619—Annual Respirator Training Refresher and Fit Testing
Security (Employees, including supervisors, who in the course of their duties may be involved with HMs and/or affect transportation (e.g., gate guard).	E29	Initial Training: R/501—Hazard Communication R/503—First Responder Operations Level R/531—Overview of Hazardous Material Transportation Refresher/Recurrent Training: R/603—Annual First Responder Operations Level Refresher/ HAZWOPER Refresher R/631—Triennial Overview of Hazardous Material Transportation Recurrent
Contracting Officer's Representative (COR)/ Contracting Officer's Technical Representative (COTR)	E50	Initial Training: R/501—Hazard Communication R/502—First Responder Awareness Level Refresher/Recurrent Training: R/602—Annual First Responder Awareness Level Refresher Depending upon assigned duties, additional courses may be selected.
Member of Emergency Response Team (HMs Technician Level is defined at Appendix C of the DLA Environmental Training Plan and at 29 CFR 1910.120 (q).)	E521	Initial Training: R/501—Hazard Communication R/504—Emergency Response (Hazardous Materials Technician) R/510—Transportation of HM/HW for DOD Refresher/Recurrent Training: R/604—Annual Emergency Response (Hazardous Materials Technician) Refresher R/610—Biennial Transportation of HM/HW for DOD Recurrent Implied Training: R/745—General Awareness, Emergency Planning Community Right-to-Know Act (EPCRA) R/749—General Awareness, RCRA Depending upon assigned duties may also require skill code E25.

Who Needs Training?	Skill Code	Required Courses
Member of Emergency Response Team (HMs Specialist Level is defined at Appendix C of the DLA Environmental Training Plan and at 29 CFR 1910.120 (q).)	E53	Initial Training:
		R/501—Hazard Communication R/505—Emergency Response (Hazardous Materials Specialist)
		R/510—Transportation of HM/HW for DOD
		Refresher/Recurrent Training:
		R/605—Annual Emergency Response (Hazardous Materials Specialist) Refresher R/610—Biennial Transportation of HM/HW for DOD Recurrent
	E531	Implied Training:
		R/745—General Awareness, Emergency Planning Community Right-to-Know Act (EPCRA)
		R/749—General Awareness, RCRA
		Depending upon assigned duties may also require skill code E25.
Member of Emergency	E54	Initial Training:
Response Team (On Scene Incident		R/501—Hazard Communication
Commander is defined		R/506—Emergency Response (On Scene Incident Commander) R/510—Transportation of HM/HW for DOD
at Appendix C of the		Refresher/Recurrent Training:
DLA Environmental		R/606—Annual Emergency Response (On Scene Incident Commander)
Training Plan and at 29 CFR 1910.120 (q).)		Refresher
		R/610—Biennial Transportation of HM/HW for DOD Recurrent
	E541	Implied Training:
		R/745—General Awareness, Emergency Planning Community Right-to-Know Act (EPCRA)
		R/749—General Awareness, RCRA
		Depending upon assigned duties may also require skill code E25.
Employees involved in	E56	Initial Training:
the receipt, storage, generation, and/or the accumulation of HW.		R/501—Hazard Communication
		R/502—First Responder Awareness Level R/508—RCRA for Generators of HW
		Refresher/Recurrent Training:
		R/602—Annual First Responder Awareness Level Refresher
		R/608—Annual RCRA for Generators of HW Refresher

Who Needs Training?	Skill Code	Required Courses
Supervisors/engineers/ scientists/specialists directly involved in Pollution Prevention/ Hazardous Minimization/ Source Reduction Programs and/or projects. Also supervisor/ specialist contributing to the review of specifications and standards.	E58I	Initial Training: R/705—Overview of Environmental Regulations R/730—Pollution Prevention Act
Environmental Compliance Auditors	E60	Initial Training: R/501—Hazard Communication R/502—First Responder Awareness Level Refresher/Recurrent Training: R/602—Annual First Responder Awareness Level Refresher Implied Training:
	E601	R/711—Environmental Audit Depending upon assigned duties, additional courses should be selected from Appendix D of the DLA Environmental Training Plan.
Employees who require state and/or local training	E69I	Depending upon assigned duties, courses will be selected from Appendix D of the DLA Environmental Training, R/700 series courses
Employees who are not professional instructors and are appointed to provide classroom training to other employees	E70I	Implied Training: R/733—Train-the-Trainer
Safety Officer, specialists, or Industrial Hygienists	E72	Initial Training: R/501—Hazard Communication R/502—First Responder Awareness Level Refresher/Recurrent Training: R/602—Annual First Responder Awareness Level Refresher Implied Training:
	L/Z1	R/705—Overview of Environmental Regulations

Who Needs Training?	Skill Code	Required Courses
Employees responsible for determining training requirements and/or implementing the DLA Environmental Training Plan, e.g., training administrators, supervisors, training point-of-contact.	E731	Implied Training: R/739—Implementing the DLA Environmental Training Plan
Fuel Terminal Quality Surveillance Representative (QSR)	E75	Initial Training: R/501—Hazard Communication R/505—Emergency Response (Specialist) R/533—Oil Pollution Refresher/Recurrent Training: R/605—Annual Emergency Response (Specialist) Refresher R/633—Oil Pollution Refresher Implied Training: R/704—Introduction to Basic Environmental Protection R/708—Hazardous Waste Management (also known as Resource Conservation and Recovery Act (RCRA)) R/729—Emergency Planning and Community Right-to-Know Act (EPCRA) R/730—Pollution Prevention Act R/732—Environmental Considerations in the Management of DOD Contracts R/734—Inland Oil Spill Control R/735—Geotech Drilling and Sampling R/736—Sampling and Monitoring
DESC Special Contracts Staff	E761	R/737—Soil Remediation Implied Training: R/704—Introduction to Basic Environmental Protection
Defense Energy Region Commanders	E771	Implied Training: R/704—Introduction to Basic Environmental Protection R/732—Environmental Considerations in the Management of DOD Contracts
Employees who may be exposed to asbestos or lead (including lead-based-paint)		Additional training requirements detailed in the DLA Environmental Training Plan
Employees who work with ozone depleting substances (ODS), compressed gas cylinders, or pesticides		Additional training requirements detailed in the DLA Environmental Training Plan.

ATTACHMENT F ES&OH MS REFERENCES

Documents

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Office of the Federal Environmental Executive (OFEE) website, Environmental Management Systems website. http://www.ofee.gov/ems/ems.htm

Pennsylvania Department of Environmental Protection, Office of P2 and Compliance Assistance (OPPCA), *Your Guide to ISO14000 and Other Environmental Management Systems*. http://www.dep.state.pa.us/dep/deputate/pollprev/Iso14001/iso14000.htm

U.S. Environmental Protection Agency, National Environmental Performance Track—Resource Center—Environmental Management Systems. http://www.epa.gov/performancetrack/tools/ems.htm

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